

**VERMONT DEPARTMENT OF PUBLIC
SERVICE**

**REQUEST FOR RECERTIFICATION OF THE
VERMONT TELECOMMUNICATIONS
RELAY PROGRAM**

Submitted to the Federal Communications Commission
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Introduction

The Vermont Department of Public Service ("VDPS") requests recertification for the Vermont program to provide Telecommunications Relay Services ("TRS") within the state pursuant to Section 401 of the Americans with Disabilities Act ("ADA"), 47 U.S.C. §225. The state has developed and implemented a program that meets all the requirements for certification set forth in that section of the ADA and in 47 C.F.R §§ 64.604-605. The Vermont program meets or exceeds all operational, technical, and functional minimum standards contained in 47 C.F.R. § 64.604; has adequate procedures and remedies for enforcing the state program; does not conflict with federal law where the state program exceeds the mandatory federal minimum standards; and is adequately funded to carry out these responsibilities.

The State of Vermont, with the assistance of Sprint Relay, has prepared this narrative and attached appendices to comply with the Federal Communications Commission (FCC) Telecommunications Relay Service (TRS) Certification Renewal Application, particularly in response to the FCC Public Notice DA 07-2761, CG Docket No. 03-123 released on June 22, 2007. Included in the Public Notice are the minimum mandatory FCC TRS requirements under 47 C.F.R. §64.604 and §64.605. A copy of this Public Notice and these mandatory requirements are attached as Appendix A.

Vermont's program to provide TRS is developed and administered by VDPS. The VDPS is an executive branch agency of the State of Vermont with the authority to supervise and direct the execution of all laws relating to public service corporations within the state. Title 30 V.S.A. §2(a). Included in the VDPS duties are planning and advocacy on behalf of the people of the state before the Public Service Board. The VDPS has primary responsibility for the Vermont Telecommunications Relay Service ("VTRS").

Operational Standards

A.1 Communication Assistants (CAs) Standards

§64.604 (a)(1)(i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities

CA Employment Standards

The VTRS Operating Standards Section D.1 require that CAs meet six minimum standards, including: basic skills in English grammar; typing speed of at least 60 words per minute; minimum spelling at a beginning college level; diction, clarity and formality of speech appropriate to communication between business professionals; ability to understand deaf people using limited English and to

translate limited written English to correct written English; and basic understanding of the characteristics of ASL. These standards are binding upon the vendor by incorporation into the VTRS contract.

Sprint provides the following description of its CA employment standards and their compliance with state and federal requirements:

Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. The first step in the CA's hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center. Sprint IP (Internet Protocol) relay CAs follow the same employment and training standards as TRS CAs. In addition, Sprint provides an enhanced Voice Carry-over (VCO) service called Captioned Telephone (*CapTel*) Service. Sprint requires that all *CapTel*/CAs have a high school graduate equivalency as a minimum qualification for the job. All Sprint Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Communication Assistants Training Program

The VTRS Operating Standards Section D.2 require ongoing training for CAs in a variety of topic areas that the standards enumerate including: ASL gloss and grammar; deaf culture and etiquette; the needs of speech-disabled users; operation of relay telecommunications equipment; procedures; ethics and confidentiality; and professional judgment. These standards are binding upon the vendor by incorporation into the VTRS contract.

Sprint provides the following description of its CA training program:

Sprint trainers use adult learning theories; training is adapted to each participant's learning modality incorporating lecture, visual graphics, flow charts, videos, role playing, and hands-on call training to stimulate the CA's ability to learn. New hires receive training in Deaf Culture, ASL translation, the needs of

non-signing deaf individuals, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hard of hearing, possesses extensive knowledge in this area. During the CA's initial training, he/she is trained and evaluated on how to accurately reflect the TTY user's communication and on the CA's role in the relay process. CAs' performance-based skills such as grammar, spelling and oral communication abilities are evaluated. Sprint works closely with local deaf and hard-of-hearing communities to identify knowledgeable presenters to assist with the training. Sprint utilizes videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers. Additionally, applicants are given written and hands-on evaluations to demonstrate their ability to spell and type accurately, process a call using live training terminals, and role-play in varying levels of ASL. CAs also receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. These training mandates and skill expectations also apply to Sprint IP CAs and VRS interpreters where appropriate. A team of ASL-fluent Sprint employees developed the ASL training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls. Please review the Sprint TRS, Speech-to-Speech (STS), *CapTel* and Video Relay Service (VRS) Training outlines in Appendix B.

Captioning Assistants Training Program

CapTel CA training includes comprehensive training on the *CapTel* Service Workstation equipment and other instruction including some live call-handling experience. All prospective CAs are required to meet all of the *CapTel*, Inc. (CTI) standards for becoming a production CA. These standards include the ability to consistently meet call-handling skills such as word per minute (WPM) averages and accuracy averages, as well as attendance and attitude standards as set by *CapTel* management. At any time if a prospective CA does not demonstrate the ability to achieve the expected standards, he/she may be removed from the training group and terminated from employment. (See Appendix B.)

All *CapTel* CAs are tested for competency in typing, grammar, and spelling to ensure skills meet the FCC Guidelines. *CapTel* CA training provides familiarity with hearing, deaf, and speech-disabled cultures. A captioned telephone user does not type while making a call, therefore there is never an opportunity for the CA to have to interpret typewritten ASL.

CapTel CAs must follow certain guidelines while supporting calls. Below is a list of these guidelines.

- 1.1 The CA shall be trained to caption the words spoken by the hearing party as accurately as reasonably possible, without intervening in

the communications. The CA is permitted to provide background noise identification.

- 1.2 The CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential.
- 1.3 The CA shall be required to meet the FCC standards for TRS minimum transcription speed.
- 1.4 The CA shall not limit the length of a call and shall stay with the call for a minimum of ten minutes when answering and placing a call.
- 1.5 The CA shall pass along a *CapTel*/caller's Automatic Number Identification (ANI) to the local Public Service Answering Point (PSAP) if the caller disconnects before being connected to emergency services.
- 1.6 Personnel supporting *CapTel* will have the requisite experience, expertise, skills, knowledge and training and education to perform *CapTel*/Services in a professional manner.

Please review the Sprint TRS, STS, *CapTel*, Video Relay Service (VRS) and IP Training Outlines in Appendix B for more information on CA training requirements.

CA Quality Assurance Programs

Monthly Surveys

Sprint Relay conducts monthly surveys and formal reviews to monitor and evaluate the continuing training for Sprint Relay TRS CAs as well as Sprint IP CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as typing accuracy, spelling, conversational English/ASL translation, clarity/enunciation, caller control, and etiquette/composure.

Quality Assurance Test Calls

To ensure that all CAs are focused on FCC requirements and state contractual commitments, Sprint centers, and/or an independent third-party quality testing firm, have been retained by Sprint to perform a total of 700 test calls. Results are provided on a quarterly basis. Feedback and appropriate guiding performance measures for specific components are addressed with each CA. Sprint Relay also conducts test calls to ensure *CapTel* quality at least once a quarter, but often conducts monthly tests of 100 test calls on *CapTel*.

Relay Program Management and Trainer Test Calls

Additionally, the Operations Department and members of the Relay Program Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery. Sprint Relay and the Relay Program Management Team also perform test calls for *CapTel* CAs.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Transmission of 60 WPM

The VTRS Operating Standards Section D.1.b require CA typing speed of at least 60 words per minute. These standards are binding upon the vendor by incorporation into the VTRS contract. Sprint describes its performance on this standard as follows:

All Sprint Relay CAs type a minimum of 60 words per minute (WPM). Sprint Relay utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure that a 60 WPM performance requirement is maintained. During this test, Sprint does not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words per minute that are typed. The most recent test results were an overall 82.5 WPM, with 97% accuracy, for all call centers. This applies to Sprint IP and IP wireless relay CAs as well. Sprint Relay utilizes technological aides such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service. *CapTel*'s voice recognition technology transmits above 100 WPM. While oral-to-type tests are waived as a result of this technology, oral-to-type tests are given to all *CapTel* CAs.

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

Sprint provides the following regarding Video Relay Service (VRS) CAs: All Sprint VRS Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

§64.604 (a)(1)(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

The VTRS operating standards, Section D.3.j, provide that “CAs shall stay with a relay call for a minimum of ten minutes” for all calls, except that “if a CA is relaying a Speech-to-Speech call they will be required to stay with the call for a minimum of fifteen minutes.” Sprint's policy and procedure for 10- and 15-minute rule on in-call replacement of CAs may be found in Appendix B.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

The VTRS operating standards, Section D.3.a, provide that “CAs shall identify themselves to a TTY user by number and gender at the beginning of each call and by number to a voice caller. Requests by users for a CA of a particular gender will be honored.” Sprint provides the following description of its procedures:

When a Sprint relay user requests a CA of the opposite gender of the CA who initially receives the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request. When a Sprint VRS, or Sprint IP or IP Wireless, user requests a specific gender, every attempt will be made to honor the request. If a change of VI is necessary during the call, every attempt will be made to accommodate the previous gender request. *CapTel* CAs are waived from this requirement. See Appendix K, FCC *CapTel*/Mandatory Minimum Standards & Compliance Matrix.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

Sprint provides the following regarding compliance with this requirement: Sprint CAs transmit and relay all conversations between the caller and the called parties in real time. *CapTel* is a transparent service. CAs transmit audio and captioned text conversations from the voice caller to the *CapTel* user in real time. Since the *CapTel* user utilizes her/her own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context

§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed

conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality Policies and Procedures

The VTRS Operating Standards Section 4 establish strict requirements for confidentiality of calls. These standards are binding upon the vendor by incorporation into the VTRS contract. Sprint provides the following description of its compliance with confidentiality requirements of Vermont and the FCC:

Sprint Relay believes that measures to ensure confidentiality are crucial to the success of TRS, Sprint IP/IP Wireless and VRS operations and has implemented procedural and environmental measures to safeguard customer and call information. In accordance with the FCC regulations, all information provided for the call set-up, including customer database records, remains confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs and Video Interpreters (VIs) lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the relay position. After the call has been terminated, billing information is transferred to billing files and is no longer available, except for billing purposes. The only exception to this policy relates to STS calls. Sprint STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

Sprint Relay's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the center, which include the following:

- Prospective CAs and VIs undergo a thorough background investigation and screening.
- During initial training, CAs and VIs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs and VIs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles, and they wear special noise reducing headsets.

- All Sprint Relay centers have security key access.
- Visitors are not allowed in relay work areas.
- Supervisors are present in the work area to observe behavior.
- All relay center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs and VIs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

Please refer to Appendix C for the TRS Pledge of Confidentiality. This document is similar to what is used for Sprint VRS interpreters and IP/IP Wireless CAs.

CapTel Captioners must comply with the same rules that TRS CAs follow regarding confidentiality. The *CapTel* confidentiality form is similar to the one for TRS (a copy of the *CapTel* confidentiality form signed by *CapTel* CAs can be found in Appendix C). Below is an explanation of confidentiality as it pertains to *CapTel* Captioners. Information obtained during a *CapTel* call should not be shared with any person except a member of the *CapTel* management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only. Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, *CapTel* in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A captionist may have problems, complaints or stress from handling the call. The captionist may ask to speak to a supervisor or other member of management (as long as it wasn't his/her call) in a private area. The success of *CapTel* depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all captionists understand and abide by the confidentiality policy. Any captionist who breaks this policy will be disciplined, up to and including termination.

STS Limited Exception of Retention of Information

At the request of a caller, Sprint Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

§64.604 (a)(2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

The VTRS Operating Standards Section D.3.b state that “Unless otherwise directed by the user, CAs shall translate into standard English calls of users who have limited written English language skills so that hearing persons can understand the call and communication occurs.” TTY users may instruct the CA to voice in standard English or word for word that which the TTY user types. This standard is binding upon the vendor by incorporation into the VTRS contract.

Sprint provides the following description of its compliance with this provision of state and federal requirements:

Sprint Relay CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation. At the request of the relay user, Sprint Relay CAs will translate written ASL into conversational English. All Sprint Relay CAs are able to translate the typed languages of relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CA's employment. In order to finish training successfully, the CA must demonstrate competent skills to translate calls as requested. Sprint VRS interpreters, Sprint IP/IP Wireless CAs and *CapTel* CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

STS Facilitation of Communication

Sprint Relay STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs are evaluated

monthly on their ability to facilitate the call without altering content of the conversation or compromising the user's control. Sprint Relay users have full control of all of their relay calls.

A.3 Types of Calls

§64.604 (a)(3)(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

The VTRS RFP requires vendors to provide all call types required by 47 C.F.R. §64.604(a)(3). The RFP is incorporated into the vendor contract by reference.

Appendix H consists of Sprint's Standard Features Matrix, which includes all call types provided by Sprint. Sprint also provides the following regarding compliance with this requirement:

Sprint Relay provides 24-hour, 7-day-a-week Telecommunications Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computer (PC) users to place local, intrastate, interstate, and international calls. Sprint Relay also processes calls to directory assistance and to toll-free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Sprint Relay retain full control of the length and number of calls placed anytime through relay. Sprint IP/IP Wireless CAs and VRS interpreters are also prohibited from refusing single or sequential calls or limiting the length of calls using relay services. *CapTel* CAs are currently waived by the FCC for outbound calls because the *CapTel* CA is not involved in the call set-up and cannot refuse the call. *CapTel* users dial sequential calls directly, therefore it is not possible for a *CapTel* CA to refuse sequential calls or limit length of calls. *CapTel* CAs are not waived by the FCC for inbound calls to a *CapTel* user made through a TRS facility. However, if a call is made directly to the captioned telephone access number no set up is involved and the *CapTel* CA cannot refuse to call. Please see Appendix K for more information on these waivers.

§64.604 (a)(3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call. (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied. (iv) Relay services shall be capable of handling pay-per-call calls.

Sprint provides the following regarding compliance with this requirement:

Sprint Relay works in conjunction with Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third party, as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Sprint Relay will also process calls to or from restricted lines, e.g., hotel rooms and pay telephones.

When a TRS or *CapTel* call is placed through Sprint Relay, the user will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time (which does not include call set-up time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. Sprint gives users the option of billing their calls to non-proprietary local- or long-distance-carrier calling cards. Sprint will process calling cards offered by the user's carrier of choice if the carrier is a participant in Sprint's Carrier-of-Choice (COC) program and as long as Feature Group D is at the carrier's access tandem. Sprint works with local exchange carriers (LECs) and interexchange carriers (IXCs) to compile and make available to all TTY or *CapTel* users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay. Sprint was the first provider to process pay per calls, beginning with the state of Texas in 1996. Sprint VRS, Sprint IP and Sprint IP Wireless are waived from these requirements. Please refer to the Sprint VRS and IP Waiver Report to the FCC, Appendix L.

§64.604 (a)(3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO.

Sprint provides the following regarding compliance with this requirement: Sprint Relay provides access to all available relay call types. A complete list of all call types provided by Sprint may be found in Appendix H, Sprint Standard Features Matrix. Most call types are waived by the FCC for IP and VRS users. (Please refer to the Sprint VRS and IP Waiver Report to the FCC, Appendix L.) Except where waived by the FCC, *CapTel* users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a *CapTel* phone. STS and HCO calls are also waived.

§64.604 (a)(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way-calling functionality.

Sprint provides the following regarding compliance with this requirement:

Call Release Functionality

TTY-to-TTY Call Release Functionality allows the CA to connect two TTY users and then drop off the line, leaving the two TTY users connected. This is especially useful for consumers needing to use a pre-paid calling card, reach another TTY user through a switchboard or operator, or when needing to speak with a voice user first. With 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

Frequently Dialed Numbers

Using frequently dialed numbers, sometimes referred to as speed dial numbers, allows relay users to store up to 10 frequently called numbers in their customer preference database along with a name for each entry. When initiating a call the user can then provide the name, instead of the entire 10-digit number, to a Sprint Relay CA. The *CapTel* Consumer Premises Equipment (CPE, or *CapTel* phone) is equipped with the ability to program three speed dial numbers, and a recently dialed number.

Three-Way Calling

Consumers who have purchased three-way calling from their LEC can use the feature when placing a call through relay. This feature allows a user to add a third party to a TRS call. For example, a TTY caller places a call to the relay service and then bridges another TTY person on his or her line. The original TTY caller then requests to place a call to a voice user. The CA will make the connection and relay the call between the voice party and both TTY users. This process would also apply if there were two voice parties and one TTY user on the line.

Sprint *CapTel* users are also able to participate in a three-way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing the telephone switch hook (or “flash”) button on his or her CPE. Thus, Sprint *CapTel* meets the requirement for three-way calling for users of One-Line *CapTel*. For Two-Line *CapTel*, either party can initiate a three-way call if the user purchased this as a LEC option. Sprint *CapTel* users are also able to participate in a conference bridge to speak to three or more individuals.

§64.604 (a)(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls which must be made by the relay user in order to complete calls involving recorded or interactive messages.

The VTRS RFP includes the following provisions regarding voice mail and interactive menus:

Answering Machine and Voice Mail Procedure

The following minimum procedures shall be used for processing relay calls that reach an answering machine or voice mail:

- a. The CA will inform the caller when an answering machine or voice mail has been reached.
- b. When the relay caller is a text user, and if the answering machine message is long, the CA will record the message, and convey it to the relay user in its entirety.
- c. The CA will relay the complete outgoing message verbatim including the option for the relay caller to leave a message if stated on the outgoing message.
- d. The CA will leave the relay caller's message (voice or text).
- e. The CA will confirm to the caller that the message has been left.
- f. The relay caller will be charged for only one call (the first call) regardless of the number of calls that may be required to retrieve and convey the answering machine message and/or to leave a message.

If the caller reaches an answering machine or voice mail, if necessary, the CA will record the voice announcement and then relay the message back to the caller without having to call back each time to get the entire message. Once the relay call is completed, the recorded message must be deleted. This may not work with voice menus.

Voice Menu Procedure

CAs shall, to the extent possible, convey the message to the text relay user as quickly as possible in order to process the relay call as quickly as possible. The relay caller will be charged for only one call (the first call) regardless of the number of calls that may be required to retrieve and convey the voice menu message.

One-Line Answering Machine or Voice Mail Retrieval

Relay users must be able to call VTRS to retrieve voice messages from answering machines or voice mail without connecting to the third party. The relay agent will record messages from answering machines or voice mail and then relay the message back to the caller. Once the relay call is completed, the recorded message must be deleted.

Sprint provides the following description of its compliance with this requirement:

When a Sprint Relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro, which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the user and deletes the recorded message. This technology greatly reduces the CA work time, as the CA does not need to make multiple out-dials. In addition, Sprint Relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to users. Sprint has developed a procedure using our Ultra WATS lines to ensure that with additional out-dials the user does not incur toll charges.

CapTel users are able to hear and interact directly with the recorded message and make selections as requested by the interactive menu. The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played. *CapTel* users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The *CapTel* user interacts with the recorded message system directly. This is treated as one call.

Callers to Sprint Relay services access 900 services by dialing a free 900 number to access the relay service. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added on the phone line. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone. The current Vermont relay 900 number is 900-230-2122.

Sprint Relay TRS, Sprint IP/IP Wireless and VRS VIs provide both answering machine and voice mail retrieval. Please refer to Appendix H, Standard Features Matrix.

A.4 Handling of Emergency Calls

§64.604 (a)(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

The VTRS Operating Standards Section D.6 require the vendor to have “policies and procedures for handling and referring emergency calls, including procedures for referring callers to emergency services and numbers.” The RFP requires the vendor to show how it will interact with Enhanced-911 including maintaining a policy for handling and referring emergency calls, interacting with Enhanced 911 to provide caller location information, and providing an outreach/education program component to educate TRS users regarding the use of E-911, rather than relay, for emergency calls. The RFP is incorporated into the vendor contract by reference. Sprint provides the following regarding compliance with this standard:

Sprint meets the requirements of emergency calls by immediately routing 911 calls to an appropriate Public Service Answering Point (PSAP) that the caller would have reached by dialing 911 directly, or a PSAP that is capable of dispatching emergency services in an expeditious manner. With one CA keystroke, Sprint’s intelligent CA application utilizes the NPA/NXX information of the inbound caller to immediately cross-reference this information to a national database containing the 10-digit emergency number for every PSAP Center. Within seconds, this number is entered in the dial window and the call is then immediately initiated.

Sprint Relay considers an emergency call to be one in which the user of the relay service indicates she/he needs the police, fire department, paramedics or ambulance. Sprint utilizes a standard E911 database that serves all of the United States and has uniform procedures, as noted below, which are followed at every Sprint Relay center.

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a hot key.
- The CA terminal will post a query containing the caller's ANI to the E911 database.
- The E911 database currently responds with the telephone number of an appropriate PSAP, automatically dials the PSAP number and passes the caller's ANI to the E911 Service Center.
- The CA will remain on the line and will verbally pass the caller's ANI to the E911 Service Center Operator.

Relay users will be encouraged to dial 911 as their primary means of contacting Emergency Services. However, if a relay user makes an emergency call through Sprint Relay, the Sprint CA will make every effort to correctly route the call to an appropriate PSAP based on the network and user-provided information. As required by the FCC, CAs will remain on the line and give the Emergency Service Provider the caller's telephone number, even if the caller is no longer on the line.

It is Sprint's opinion that in some emergencies, valuable time could be lost if the TTY call were to be transferred to the PSAP, and the results could be life

threatening. Therefore, Sprint will allow direct TTY-to-TTY communication in the following scenarios, if allowed by the FCC:

- At the request of the caller,
- At the request of the PSAP Operator or PSAP Supervisor,
- The CA will remain connected and will silently monitor the call, if:
- The PSAP is not capable of receiving and conversing directly with the caller in the modality of the caller (i.e., if the caller is using a communication modality other than TTY, [e.g., VCO, HCO, STS, ASCII, VRS, or Internet Relay]), or
- The CA is having technical trouble transferring the call to the PSAP (the caller is disconnected from the PSAP, the PSAP cannot establish a TTY connection, etc.).

The CA will assist, as necessary, to maintain communications between the PSAP and the caller. Otherwise, the Sprint CA will remain on the line to provide assistance as necessary to facilitate communication for all emergency calls and will not disconnect until the call has been completed.

The FCC waives 911 services for IP and VRS providers. Sprint strongly encourages Internet Protocol relay users to dial 911 directly to receive prompt emergency services via TTY or phone.

Sprint IP via website permits manual 911 processing. If a user tells the operator to dial 911, the operator will request supervisor assistance. The user will need to provide the address and city where he/she is calling from. The supervisor will call Directory Assistance (on a separate phone call) to obtain the 10-digit emergency PSAP number. The supervisor will then pass to the CA to make the outbound call to the 911 dispatcher (PSAP). It can take a few minutes to get the information. Users are encouraged to register a 10-digit emergency number on the website for more efficient call processing. More information about Sprint's procedure for handling E911 calls, including *CapTel* calls, may be found in Appendix D.

Telecommunications Service Priority Program

In 1988, the FCC's Telecommunications Service Priority (TSP) program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a national disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

On May 11, 2005, Sprint began implementing TSP throughout its network. On October 31, Sprint announced that it had completed all milestones in enrolling its TRS in the TSP program, and had successfully activated all 14 call centers under the TSP program. Sprint's participation in the TSP program strengthens its already robust reliability.

The Sprint TRS network is designed to reroute traffic to other Sprint Relay centers across the country to provide uninterrupted service. However, if a national or regional emergency causes service to be disrupted and the relay call center is unable to receive or place calls, Sprint's participation in the TSP program means that Local Exchange Carriers (LECs) are required to restore service to the relay call center as rapidly as possible, consistent with the priority status assigned to the relay call center. Unlike other TRS providers, when a disaster occurs, Sprint TRS has the ability to reroute calls immediately to unaffected relay call centers and continue processing calls with minimal customer impact.

The Sprint Relay Call Centers participating in TSP are:

- Albuquerque Switch (Albuquerque, NM and Honolulu, HI)
- Austin Switch (Austin, TX and Lubbock, TX)
- Dayton Switch (Dayton, OH and Cayce, SC)
- Independence Switch (Independence, MO)
- Jacksonville Switch (Jacksonville, FL)
- Lemoore Switch (Lemoore, CA)
- New Jersey Switch (Vineland, NJ)
- Sioux Falls Switch (Sioux Falls, SD and Moorhead, MN)
- Syracuse Switch (Syracuse, NY and Holyoke, MA)

The TSP program ensures that Sprint Relay call centers are placed on a priority basis to re-establish telephone service for Vermont relay users. Sprint is proud to voluntarily comply with the FCC's TSP program. Please see Appendix N for a copy of the general press release regarding the TSP program.

A.5 STS Called Numbers

§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Sprint provides the following regarding compliance with this requirement:

Sprint's Relay customer database is available to Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user dials into one of the Sprint Relay numbers. The customer database helps to facilitate call set-up and conversing preferences for the STS user. Customer profile information contained in the Sprint Customer Database will be transferred to any new provider at the end of the contract term.

Currently, FCC requirements for STS are waived for Internet Relay, Video Relay and *CapTel* services.

Technical Standards

B.1 ASCII and Baudot

§64.604 (b) Technical standards. (1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

The VTRS Operating Standards Section B.2 require the vendor to be “capable of receiving and transmitting both in Baudot and ASCII codes, at any speed in general use, able to automatically identify all incoming TTY signals as either Baudot or ASCII, and compatible with industry-wide standards for TTY machines.” Sprint provides the following regarding its compliance with this requirement and its provision to Vermont customers of TurboCode.

Each Sprint CA position is capable of receiving and transmitting in voice and Baudot (including TurboCode™ and E-TurboCode™), as well as ASCII codes. Upon a call being received at the CA position, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the baud rate is detected. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station. This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum. ASCII rates up to and including 19,200 bps are supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 bauds are also supported. Sprint IP currently provides relay services via ASCII connection. Currently, FCC ASCII and Baudot requirements are waived for *CapTel* services. For more information about *CapTel* waivers, see Appendix K.

B.2 Speed of Answer

§64.604 (b)(2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Sprint provides the following regarding compliance with this requirement:

Sprint has gained valuable experience in sizing its TRS operations to accommodate contract requirements. Historical call detail has been gathered in 15-minute periods throughout the years of providing TRS service. This historical

information is combined with state-specific information to establish anticipated call patterns that accurately predict the personnel needs necessary to efficiently process relay calls.

Sprint meets the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint will ensure that no more than 30 seconds elapses between the receipt of the dialing information and the dialing of the requested number.

Sprint samples the average answer time a minimum of every 30 minutes in each 24-hour period. Sprint's Traffic Management Control Center (TMCC) and our Enhanced Services Operations Control Center (ESOCC) are staffed with professionals who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

The Sprint centers that serve Vermont are provided with sufficient facilities to provide a Grade of Service (GOS) of P.01 or better for calls entering the Vermont call center switch equipment. Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

Performance of inbound traffic on each toll-free number where it enters the Sprint network is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report and sent to the state. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations. The data are monitored for both short- and long-term trends to ensure the most cost-effective use of resources.

Sprint also meets requirements for Sprint IP/IP Wireless, VRS and *CapTel* calls. Sprint *CapTel* ensures that 85% of all calls are answered within 10 seconds and that callers' calls are immediately placed. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of-answer calculation. Sprint *CapTel* system is designed to a P.01 standard or greater, measured on a daily basis.

§64.604 (b)(2)(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

The VTRS Operating Standards Section C.3 require that “at least 85 percent of the calls shall be answered by a Communications Assistant within ten seconds. This shall be measured on a daily basis.” The VTRS Operating Standards Section C.2 mandate that “no more than one percent of calls at the busiest hour will be unable to be delivered to the relay center due to inadequate facilities. In addition, there is a minimum blockage standard, measured daily, of no greater than one percent. The call blockage rate shall be measured by dividing the number of blocked and not answered calls by the number of total call attempts.” Compliance is monitored through a requirement that the provider supply monthly statistical reports demonstrating performance on the speed of answer and blockage standards. Sprint provides the following regarding compliance with this requirement:

Sprint has met the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint samples the average answer time a minimum of every 30 minutes in each 24-hour period. Sprint currently samples every 15 minutes. Sprint Relay is committed to providing relay users with functionally equivalent telecommunications services as those enjoyed by standard telephone users. To this end, Sprint will continue to answer 85% of all relay calls within 10 seconds. There will be no more than 30 seconds of elapsed time between receipt of dialing information and the dialing of the requested number. Sprint begins measuring speed of answer at the time the call hits the relay switch. Calls are answered by a live CA and are not placed in a queue or on hold after reaching the relay switch.

Sprint's Service Level calculation for TRS

Sprint's Service Level calculation for all TRS calls, excluding *CapTel*, is described below:

Number of calls handled < 10 seconds/(total calls handled + total calls abandoned)

The SVL is the number of calls handled in 10 seconds or less divided by the total number of calls offered.

(Number of calls offered = total number of calls handled + total number of calls abandoned.)

(SVL = Number of calls handled in < 10 seconds/number of calls offered.)

Sprint's Service Level Calculation for CapTel

For *CapTel* users, the number of calls that arrive at the *CapTel* call center will be the number of Calls Offered.

The number of calls that are answered by a CA is the number of Calls Answered.

The time between when the call arrives at the *CapTel*/call center and the time it is answered by a CA until it is abandoned is the Speed of Answer.

Any time spent in the voice-in telephone menu is time controlled by the user to enter in the phone number of the *CapTel*/ user they are calling. This time is subtracted out from the speed-of-answer time.

The total number of calls with Speed of Answer as 10 seconds or less is the number of Qualifying Calls.

Qualifying Calls divided by Calls Offered = Service Level (x percent of calls answered within 10 seconds).

Sprint's Weighted Service Level for TRS

Sprint uses a “weighting” process to combine the results of several call centers into a single result:

The “weighted” service level (SVL) is a calculation that multiplies the number of Vermont relay calls handled in each center by the center's daily SVL (the outcome is a factor called “SVL points”). The resultant “SVL points” for each center that handled Vermont's traffic is then summed. The sum of the “SVL points” is then divided by the total number of Vermont relay calls to get a daily “weighted” SVL.

Sprint will answer 85% of all calls within 10 seconds on a daily basis and will not place a caller in queue or on hold. The ten seconds begins at the time the call is delivered to the Sprint Relay center and Sprint will ensure that adequate network facilities are available to avoid the possibility of a busy response due to loop trunk congestion.

Sprint's Service Level for CapTel

While *CapTel*/operates two *CapTel*/call centers, all calls are directed through one Automatic Call Distributor switch. All calls are answered in the order received and the service level is measured, unweighted, by this switch.

§64.604 (b)(2)(ii)(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

Sprint provides the following regarding compliance with this requirement: Sprint considers the call delivered when the relay center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS center. Sprint furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint is a

certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases exceed, the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

§64.604 (b)(ii)(D) The system shall be designed to a P.01 standard.

Sprint provides the following regarding compliance with this requirement:

Sufficient transmission facilities have been provided to service all traffic levels, including busy-hour peaks. Sprint utilizes trunks that are sized to provide a busy-hour Grade of Service (GOS) of P.01, or a minimum of 99 out of 100 calls will have unrestricted and immediate access to the call center facilities during the busiest time of day. Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations. Sprint ensures no greater than 1% blockage on a daily basis. Sprint offers Vermont relay customers the advantages of a superior digital fiber network unsurpassed in the industry. Through use of leading switch technology and SONET network survivability techniques, Sprint's network ensures a very low level of call interruption or blockage.

The Sprint network switch architecture is non-hierarchical; that is, all switches are directly interconnected. Sprint switches are processor controlled using advanced digital technology and are virtually non-blocking. A call across the Sprint network passes over Inter-Machine Trunks (IMTs), which are engineered at a P.01 grade of service (GOS) at the busy hour to allow for maximum network call completion. The P.01 GOS requirements ensure that at least 99% of calls to the relay center will reach a CA. The Local Exchange Carrier (LEC) network typically utilizes a P.01 grade of service also, and similar blockage rates should apply on their facilities.

§64.604 (b)(ii)(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Sprint provides the following regarding compliance with this requirement: Performance of inbound traffic on each toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly.

These measurements, which include traffic volume and blockage data, are compiled into a monthly report and sent to the VDPS under the terms of its contract with Sprint.

§64.604 (b)(iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Sprint provides the following regarding compliance with this requirement: Sprint Relay complies with this requirement. Please refer to Sprint Relay's Report to the FCC under Appendix L.

B.3 Equal Access to Interexchange Carriers

§64.604 (b)(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

The State of Vermont's RFP requires the following: "The VTRS provider will allow the relay user to choose his or her preferred interexchange carrier when placing toll calls through relay. The relay agent is not required to verbally offer the option, but must describe the option when asked by a relay user. An explanation of carrier of choice must be included in all appropriate relay publications and materials. The provider must maintain a list of participating long distance carriers and must, on an annual basis, mail to IXCs who do not participate a letter inviting them to become a part of relay carrier of choice."

Sprint provides the following description of its carrier-of-choice provisions and list of current participants:

Sprint provides Vermont relay callers with the ability to have their intrastate, interstate and international calls carried by any interexchange carrier that has agreed to participate in Sprint's Carrier-of-Choice (COC) program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant; if it is, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid, and calling card. The current participating members of Sprint's Carrier-of-Choice program are:

AT&T Communications	Souris River Telecommunications
Bell South Long Distance	Sprint
Bestline	Telecomm*USA (MCIWorldCom)
Birch Telecom	Touch America Services, Inc.
Broadwing Communications	U.S. Link

Broadwing Telecommunications Communications	VarTec dba Clear Choice
Cox Communications	VarTec Telecom, Inc.
Excel Telecommunications, Inc.	Verizon Long Distance
Global Crossings Telecommunications	Winstar
MCIWorldCom	Working Assets
McLeod USA	WorldCom
Qwest Communications	WorldXChange
SBC Communications Long Distance	

If a Vermont relay caller does not indicate a COC preference to the CA, either on-line or in the customer database (or if his/her preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, Sprint has established a procedure in which the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourages the carrier's participation.

Please see Appendix E for a sample of the Carrier-of-Choice letter sent to carriers when a customer has a preferred interexchange carrier that does not participate in the Sprint COC program.

B.4 TRS Facilities

§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

The VTRS Operating Standards Section B.1 require the provision of a consistent level of service 24 hours per day, seven days per week, each day of the year. Vermont has, since the inception of permanent relay, contracted for provision of service with vendors whose centers are out of state. Because of the small size of the state, a requirement for an in-state center would be impractical. The VTRS Operating Standards Section B.5 require uninterruptible power, switching redundancy, intercept messages in the case of system failure, and a disaster recovery plan. Sprint provides the following description of its compliance with TRS facilities requirements:

Sprint TRS and Sprint Relay Customer Service are both available 24 hours a day, every day of the year. Sprint utilizes both uninterruptible power supply (UPS) and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. Uninterruptible power supply is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in

service for longer periods of time as long as fuel is available. Sprint IP/IP Wireless, VRS and *CapTel* Relay Services are also available 24 hours a day, seven days a week.

§64.604 (b)(4)(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

Sprint provides the following regarding compliance with this standard:

Sprint Relay Network Support Plan

Service Reliability

Sprint's service is provided through an all-fiber sophisticated management control network that supports backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes. A 100 percent fiber optic network provides critical advantages over the other carriers. These advantages include:

Quality

Since voice and data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

Economy

The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs Sprint less to maintain, thereby passing the savings on to our customers.

Expandability

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

Survivability

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable

cut. This is a significant benefit to Vermont, and a competitive differentiation of the Sprint network.

Network switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass Sprint's system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control centers. These factors combine to assure outstanding network performance and reliability for Vermont.

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every inter-LATA and intra-LATA call available in the United States. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Service Restoration

Sprint provides for the restoration of service in the event of equipment malfunctions, isolated network overloads, major network disruptions and national/civil emergency situations. In the event of service disruption due to Sprint's equipment, service typically is restored within four hours after notification. Sprint does everything possible to prevent a total outage at its switch sites or at any of its points of presence (POPs) through the use of advanced site designs. All processors, memory, and switch networks within Sprint's switches are fully redundant. All switch sites are protected by uninterruptible power

supplies and halon systems planned in conjunction with local fire departments. Most of Sprint's new sites are earth sheltered to increase survivability. A multi-pronged program is used to minimize outages:

Sprint does everything possible to minimize the impact of a "single point of failure." This includes:

- Diversification of all facilities' demands between switch sites. All switch sites are connected to the long-haul network over at least two separate Sprint fiber routes; many have three paths.
- Deployment of multiple switches at large switching centers. This prevents a single switch outage from disabling the site.
- Having systems in place allowing for the rapid redeployment of network resources in case of a catastrophic outage. Fiber cuts, which can affect thousands of calls at several locations, are sometimes unavoidable. Response to these outages is maximized through the following procedures:
 - Utilization of established plans to respond effectively to these outages.
 - The capability to rapidly deploy network transmission facilities when needed.
 - Immediate execution of alternate routing in the digital switches and cross-connect systems to assist in the handling of temporary network disruptions and forced overloads.
 - The entire spectrum of survivability needs, expectations, and requirements can be met by the proper engineering of customer and Sprint switches and facilities.

Fiber Backbone Loop Topology and Reconfiguration

Fiber optic cable routes are designed to include redundant capacity to insure survivable fiber optic systems. Sprint's SONET network, using four-fiber bidirectional line switched ring capability, allows automatic switching to alternate paths to provide for traffic rerouting in the event of a route failure. The SONET fiber optic backbone topology is currently designed with more than 100 overlapping rings to ensure sufficient alternate paths for total network survivability.

Please see Appendix F for Sprint's Outage Prevention Program. Also, please refer to the Disaster Recovery Plan provided in Appendix G for a complete explanation of Sprint's back-up plan.

B.5 Technology

§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Sprint provides the following regarding compliance with this requirement:

Sprint is in full compliance with 47 CFR §64.1600 et seq. of the FCC's rules for providing SS7 capability. In order to achieve functional equivalence, Sprint will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called party for local and long-distance calls. Sprint receives calling party identifying information, including blocking information, from all relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound relay caller and other SS7 call information elements, such as:

- Calling Party Number
- Charge Number
- Originating Line Information

Sprint passes through the calling party information (rather than 711 or the number of the relay center).

Sprint meets all minimum technological standards regarding Video Relay Service (VRS). Sprint VRS is available through www.sprintVRS.com and sprintrelay.tv (for videophone users).

On July 31, 2006, Sprint launched MySprintVRS Number. This feature empowers deaf and hard-of-hearing Video Relay Service (VRS) users with a simple means of receiving incoming calls. With MySprintVRS Number, a hearing user dials one toll-free number and reaches an interpreter who connects the caller to the deaf or hard-of-hearing VRS user without supplying any additional information.

The value of a dedicated personal number is generally taken for granted. Without a dedicated personal number, things such as entering a contact number in a department email directory or printing one simple number on a business card are

much more complicated. Today, telephone numbers are also used as account identifiers or for ordering items. Sprint, unlike most other VRS providers, makes this possible.

For VRS users who have not registered for MySprintVRS Number, hearing callers may dial a general access toll-free number and provide the video interpreter (VI) with the VRS user's IP address, or their Sprint VRS mail extension number.

On October 28, 2006, Sprint also introduced a revolutionary means of wirelessly accessing Sprint VRS mail. Sprint, as a telecommunications provider, is uniquely positioned to make retrieval of VRS mail from wireless devices possible from devices with Windows Media Player capability. Sprint VRS Mail for Wireless Devices is extremely popular and empowers VRS users to access and play back VRS messages directly from their handset.

In addition to providing Sprint IP Relay services, Sprint is also proud to offer the Deaf and Hard-of-Hearing community with cutting-edge Sprint IP technology using AIM®. Sprint IP Relay is capable of blending the easy-to-use capabilities of Sprint IP Relay with the power of wireless devices and equipment that run AIM®. In addition to the ability to place a relay call over the internet, the wireless user can access Sprint IP on a wireless device with AIM®. This service allows users to access relay from the park, a restaurant, or even the airport – anywhere a wireless device can access the internet and AIM®. Sprint also provides *CapTel* service, which is recognized as an enhanced voice carry-over (VCO) service. For more information on technology provided through Sprint Relay, please refer to Appendix M, Sprint Relay Fact Sheet.

B.6 Caller ID

§64.604 (b)(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Sprint provides the following regarding compliance with this requirement:

Sprint Relay offers network-based Caller ID for all outbound calls that traverse over Sprint's Integrated Services Digital Network (ISDN) and SS7 with Feature Group D (FGD) network. This feature supports Caller ID for all local and long-distance calls. In all cases in which it is received, Sprint forwards the calling party's ANI (Automatic Number ID) to the terminating LEC for long-distance calls utilizing Sprint's FGD trunks. As with standard telecommunications, the terminating LEC may or may not choose to use this ANI information as Caller ID information and pass this on to the terminating number. When passed through,

the relay call recipient will be able to see the caller's phone number on their Caller ID display (the Caller ID option feature must first be purchased through the caller's LEC). When not passed through, as with standard telecommunications, the call recipient will receive a message such as "OUT OF AREA" or "CALLER UNKNOWN."

Functional Standards

C.1 Consumer Complaints and Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

The VTRS Operating Standards Section C.5 require that the vendor maintain procedures for handling complaints, inquiries and comments regarding VTRS services and personnel. These procedures must include mandatory provision of the VDPS Consumer Affairs TTY Hotline (a toll-free consumer complaint number answered by VDPS Consumer Affairs staff) when consumers indicate, directly or indirectly, that they are not satisfied with a VTRS response. The procedure and the Hotline number must be described in the vendor's outreach material. Callers to the relay center who have a complaint must be able to reach a supervisor while still on the line. All complaints received by the vendor must be forwarded to the VDPS monthly and logged in detail. Sprint complies with these requirements.

When the VDPS receives a complaint, Consumer Affairs staff conduct an investigation by requesting any additional information that may be needed from the consumer, and then contacting the company to obtain an explanation and whatever correction or relief may be needed. The case record is not closed until a satisfactory resolution has been reached and the consumer understands the outcome, or, if such resolution cannot be achieved, until the case is referred for formal action to the Vermont Public Service Board.

Complaints can be filed by phone, fax, email, or TTY. The contact information for complaints is as follows:

Consumer Affairs & Public Information
Vermont Department of Public Service

112 State Street
Montpelier, VT 05620-2601
800-622-4496 – voice consumer hotline
800-734-8390 – TTY consumer hotline
802-828-2342 – fax
consumer@state.vt.us – e-mail

A copy of Vermont's annual consumer complaint log filed with the FCC in June 2007 is attached as Appendix O. In addition, Sprint provides the following regarding compliance with this requirement:

Sprint has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24 hours a day to accept, document, and forward complaints to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customer.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Relay Program Manager is responsible for tracking all technical complaints and following up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Vermont relay users also have the option of calling Sprint's 24-hour Customer Service Department (1-800-676-3777) or the Vermont Relay Program Manager to file complaints or commendations.

Sprint has the capability to transfer the caller on-line to the Customer Service Department. A Customer Service Representative will always answer the call live. The assigned Relay Program Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month. To assist customers in identifying contact information for complaints, the toll-free Customer Service number and other contact information is included on all brochures and outreach materials, including relay web sites.

Sprint provides copies of each TRS Customer Contact Form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved, an explanation of the resolution and any other pertinent information to the VDPS. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the states in which it provides relay service. By June 15th of each calendar year, Sprint submits a copy of the 12-month complaint log report for the period June 1 through May 31 to state relay administrators.

Sprint Relay submits directly to the FCC by the July 1st deadline all Interstate Relay (Sprint IP, IP Wireless) and Video Relay Service complaints from June 1 through May 31st of each year.

C.2 Contact Persons

§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

Vermont's contact person registered with the FCC for purposes of compliance with 47 C.F.R. §64.604(c)(2) is as follows:

Stephen J. Wark
Director for Consumer Affairs & Public Information
Vermont Department of Public Service
112 State Street
Montpelier, VT 05620-2601
802-828-4021 voice
802-828-2342 fax
stephen.wark@state.vt.us email

C.3 Public Access to Information

§64.604 (c)(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the

public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

The VTRS Operating Standards Section C.7 require an ongoing community and business outreach program to educate all potential users in Vermont about the relay service. This requirement is operationalized through the contract with the vendor, which employs an in-state Account Manager, who oversees the state outreach program based on the input given by the VDPS, the VTRS advisory council and Vermont consumers. Additionally the Account Manager hires subcontractors approved by the VDPS to conduct outreach activities.

Information is distributed through several means, not limited to: brochures, state TRS newsletters, a state-specific web site (www.vermontrelay.com), public service announcements, newspaper and magazine advertisements and articles, informational videotapes, business workshops, exhibits, one-to-one meetings and recreational events. The focus under the current contract is on the Don't Hang Up campaign, CapTel, Speech-to-Speech and Hearing Carry-over services

A copy of the outreach plan for the current contract, including Sprint's outreach scope of work, is attached as Appendix P.

C.4 Rates

§64.604 (c)(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination

VTRS users are charged no more for services than for those charges paid by standard "voice" telephone users. Vermont requires that all calls placed through relay be billed at 50 percent off the rate paid by persons calling without using relay. This provision applies both to the vendor and to any other company billing a Vermont relay user for intrastate calls. The requirement applies by Vermont Public Service Board order and rule to all carriers and by means of the contract to the vendor, Sprint. Sprint provides the following information about its compliance:

Vermont relay users who select Sprint as their interstate long-distance carrier will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users who select a preferred interstate carrier via the Sprint COC list

will be rated and invoiced by the selected interstate carrier. By FCC jurisdiction, Sprint has two separate Message Telephone Service (MTS) rates – one for interstate and one for intrastate. The table below exhibits the discounted rates off Sprint’s MTS rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	90%	50%
Evening (7 PM – 10:59 PM)	90%	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	90%	50%

C.5 Jurisdictional Separation of Costs

§64.604 (c)(5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended. (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All Vermont relay intrastate and interstate minutes are reported separately and distinctly to the state on the vendor’s invoice. Interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State of Vermont.

Intrastate TRS services are funded through a state universal service fund surcharge on all telecommunications services billed to a Vermont address. The surcharge is capped at 2 percent, and is set annually at a level sufficient to fund projected costs for program administration, Lifeline, Vermont TRS and its associated equipment distribution program, and Enhanced-911. The current rate, through August 31, 2008, is 1.25%. Each year, the docket establishing the surcharge level includes a requirement for all carriers to send out two outreach

notices that provide information about what programs are funded by the state universal service fund. Vermont TRS is included in those notices. A copy of the enabling legislation is included in Appendix Q, and samples of customer notices are included in Appendix R.

In addition, Sprint provides the following: On individual customer invoices, Sprint deducts minutes that the National Exchange Carrier Association (NECA) would reimburse. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, Vermont receives a 51% deduction for Toll Free and 900 minutes since this is what NECA would reimburse. For NECA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to NECA for reimbursement.

C.6 Treatment of TRS Customer Info

§64.604 (c)(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

The VTRS contract requires that the vendor transfer customer profile data to the new provider at the end of its contract if a change of vendor is occurring. The vendor is prohibited from using the data for any person other than to connect the TRS user with the called parties desired to be reached by the caller. Sprint provides the following discussion of its treatment of the customer preference database:

The Sprint Customer Preference Database includes items such as types of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes. At the end of the ensuing contract(s) Sprint will transfer all Vermont relay database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

§64.605 State Certification

§64.605 (a)(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

Vermont's program to provide TRS is developed and administered by the VDPS. The VDPS is an executive branch agency of the State of Vermont with the authority to supervise and direct the execution of all laws relating to public service corporations within the state (Title 30 V.S.A. §2(a)). Included in the VDPS duties are planning and advocacy on behalf of the people of the state before the Public Service Board. The VDPS has primary responsibility for the Vermont Telecommunications Relay Service ("VTRS").

In 1991, the State of Vermont enacted legislation mandating a permanent, statewide telecommunications relay service (see Appendix Q). Title 30 V.S.A. §218a. The legislation expressly states that its purpose is to authorize the establishment of a permanent TRS to further the goal of universal service, satisfy the ADA requirements, and comply with all regulations promulgated by the FCC. Under Vermont Law, the VDPS must set standards that equal or exceed those mandated by the ADA and must require the designated provider to comply with FCC standards.

Section 218a(e) also directs the costs of the VTRS to be included as part of the telephone Lifeline program established under 30 V.S.A. §218. To ensure continued input from the deaf, hearing- and speech-impaired community, the statute establishes a VTRS advisory council, with designated positions for consumer representation, to advise the VDPS and the contractor for VTRS on all matters concerning the implementation and administration of the VTRS.

Following enactment of the state legislation, Vermont developed the standards for the VTRS. These standards were designed consistent with §218a to meet or exceed the minimum requirements established in the ADA and are consistent with or exceed the minimum requirements set forth in 47 C.F.R. §64.604. The "Operating Standards" for the VTRS, as amended in August 2007, conform to the 2000 amendments to 47 C.F.R. §§ 64.601 - 64.605, and are attached as Appendix S.

The vendor to provide VTRS is chosen through competitive bidding. Amendments to 30 V.S.A. § 218a passed in 2005 no longer require the VDPS to submit its recommendation and any proposed contract to the Vermont Public Service Board ("VPSB") for approval. Subsection (c) states, "The department of public service may contract with the qualified bidder offering the most favorable proposal, giving due consideration to costs, to quality of service, and to the interests of the deaf, hearing impaired, and speech impaired community." No contract may extend for more than four years.

In 2005, the VDPS issued a request for proposal ("RFP") for a vendor to provide VTRS for the period July 1, 2006, through June 30, 2008, with the option of renewal for an additional two years, through June 30, 2010. A copy of that RFP and addendum is attached as Appendix T. Two vendors submitted bids for the contract, and, following an evaluation of proposals by VDPS staff and consumer advisors, as well as negotiations between the VDPS and Sprint regarding the outreach component, the VDPS entered into a contract with Sprint. Portions of the contract are attached as Appendix U.

The Vermont TRS program meets all operational, technical and functional minimum standards contained in 47 C.F.R. §64.604, as described in detail above. No aspect of the program conflicts with federal law. As described above, Vermont makes available adequate procedures and remedies for enforcing the requirements of the state program, including publicizing the various means for users to file a complaint through written material and extensive face-to-face community outreach. In addition, Sprint provides the following:

Sprint does not provide Video Relay Services or Internet Relay services for the state of Vermont under the terms of its contract with the state. Although there are references to Sprint IP Relay and Sprint VRS Relay services, Sprint does not contract to provide these services, nor does Sprint oversee these services for the state of Vermont

§64.605(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

The state of Vermont had the following substantive change to its TRS program since the last certification with the FCC: Vermont added Captioned Telephone *CapTel* service to the relay services available to Vermont consumers as of July 1, 2004. Please see the letter sent to the FCC regarding this change, in Appendix V.

Appendix A: FCC TRS Public Notice, June 22, 2007 and Mandatory Minimum Standards



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 07-2761
June 22, 2007

CONSUMER & GOVERNMENTAL AFFAIRS BUREAU REMINDS STATES THAT CURRENT TELECOMMUNICATION RELAY SERVICE (TRS) CERTIFICATION WILL EXPIRE ON JULY 26, 2008, AND PROVIDES A TIMELINE FOR SEEKING RECERTIFICATION

CG Docket No. 03-123

The current TRS certifications for all states and territories will expire on July 26, 2008. Under the TRS regulations, states can apply for “renewal” one year prior to expiration, *i.e.*, July 26, 2007. 47 C.F.R. § 64.605(c).

BACKGROUND

TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with voice telephone users. Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA), codified at Section 225 of the Communications Act of 1934. 47 U.S.C. § 225. Under the statute, TRS services are intended to be functionally equivalent to voice telephone service. The TRS regulations set forth mandatory minimum standards that TRS providers must follow in offering service, and are intended to ensure that TRS meets the functional equivalency mandate. *See* 47 C.F.R. §64.604 (set forth in the attached Appendix).

Because the states have primary responsibility for the oversight and compensation of intrastate TRS, the regulations also set forth the process by which state TRS programs may be certified. 47 C.F.R. § 64.605; *see also* 47 U.S.C. §§ 225(c) & (d)(3)(B). The state certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. The relevant sections of § 64.605 are set forth in the Appendix.

APPLICATIONS FOR CERTIFICATION:

Applications for certification (or renewal of certification) may be filed with the Commission beginning July 26, 2007. All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and Speech-to-Speech (STS) service. If a state program also offers Internet Protocol (IP) Relay, Video Relay Service (VRS), Captioned Telephone Service, or IP Captioned Telephone Service, the state must also demonstrate that it provides these services consistent with the rules.

Although there is no deadline for filing, renewal applications should be filed by October 1, 2007, to give the Commission time to review and rule on the applications prior to the expiration of the prior certification.

Applications for certification are reviewed to determine whether the state TRS program has sufficiently documented that it meets all of the applicable mandatory minimum standards set forth in Section 64.604. If the program exceeds the mandatory minimum standards, the state must certify that the program does not conflict with federal law.

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123.

Electronic Filers: Filings may be filed electronically using the Internet by accessing the ECFS: <http://www.fcc.gov/cgb/ecfs/>. Follow the instructions provided on the website for submitting electronic filings.

- For ECFS filers, if multiple docket or rulemaking numbers appear in the caption of this proceeding, filers must transmit one electronic copy of the filing for each docket or rulemaking number referenced in the caption. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic filing by Internet email. To get filing instructions, filers should send an email to ecfs@fcc.gov, and include the following words in the subject line or body of the message: get form <your email address>. A sample form and directions will be sent in response.

Paper Filers: Parties who choose to submit by paper must submit an original and four copies of each filing on or before October 1, 2007. To expedite the processing of complaint log summaries, states and interstate TRS providers are encouraged to submit an additional copy to Attn: Diane Mason, Federal Communications Commission, Consumer & Governmental Affairs Bureau, 445 12th Street, SW, Room 3-A503, Washington, D.C. 20554 or by email at Diane.Mason@fcc.gov. Parties should also submit electronic disk copies of their certification filing on a standard 3.5 inch diskette or CD-Rom formatted in an IBM compatible format using Word 2003 or compatible software. The electronic media should be submitted in “read-only” mode and must be clearly labeled with the state’s name, the filing date and captioned “TRS Certification Application.”

Filings can be sent by hand or messenger delivery, by electronic media, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail).

The Commission's contractor will receive hand-delivered or messenger-delivered paper filings or electronic media for the Commission's Secretary at 236 Massachusetts Avenue, NE, Suite 110, Washington, D.C. 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building. Commercial and electronic media sent by overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743. U.S. Postal Service first-class mail, Express Mail, and Priority Mail should be addressed to 445 12th Street, SW, Washington, D.C. 20554. All filings must be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Room TW-B204, Washington, D.C. 20554.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE:

DATE	ITEM	FCC ACTION
October, 2007	Public Notices are issued indicating that applications have been received by the Commission and seeking comment	Public Notices are released seeking comment on the filing. Comments due within 30 days and then an additional 15 days for reply comments.
September 2007 – May 2008	Applications for TRS recertification are reviewed for compliance with 47 C.F.R. §§ 64.604 & 64.605.	Deficiency letters are sent to request additional information that demonstrates compliance with the mandatory minimum requirements.
May - July, 2008	Public Notices informing states that their applications for recertification have been reviewed and certification has been renewed.	Public Notice

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Suite CY-A257, Washington, D.C. 20554, (202) 418-0270. These documents also may be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, D.C. 20554. Customers may contact BCPI at their web site: www.bcpweb.com or by calling 1-800-378-3160. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at <http://www.fcc.gov/cgb/ecfs> (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice),

(202) 418-0432 (TTY). This *Public Notice* also can be downloaded in Word or Portable Document Format (PDF) at: <http://www.fcc.gov/cgb/dro>.

For further information regarding this *Public Notice*, please contact Diane Mason, Consumer & Governmental Affairs Bureau, Disability Rights Office, at (202) 418-7126 (voice), (202) 418-7828 (TTY), or e-mail at Diane.Mason@fcc.gov.

APPENDIX

RELEVANT RULES:

§64.604 MANDATORY MINIMUM STANDARDS¹

The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.

- (a) *Operational standards*—(1) *Communications assistant (CA)*. (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.
- (ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.
- (iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.
- (iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A “qualified interpreter” is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.
- (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.
- (vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.
- (vii) TRS shall transmit conversations between TTY and voice callers in real time.
- (2) *Confidentiality and conversation content*. (i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.
- (ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the

¹ Note that some of these requirements have been waived for certain forms of TRS.

conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

(3) *Types of calls.* (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

(iv) Relay services shall be capable of handling pay-per-call calls.

(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

(4) *Handling of emergency calls.* Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

(5) *STS called numbers.* Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

(b) *Technical standards—(1) ASCII and Baudot.* TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

(2) *Speed of answer.* (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in

a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

(iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

(3) *Equal access to interexchange carriers.* TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

(4) *TRS facilities.* (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

(5) *Technology.* No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 *et seq.*

(6) *Caller ID.* When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

(c) *Functional standards—(1) Consumer complaint logs.* (i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

(2) *Contact persons.* Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;

(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and

(iii) The physical address to which correspondence should be sent.

(3) *Public access to information.* Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

(4) *Rates.* TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.

(5) *Jurisdictional separation of costs—(i) General.* Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.

(ii) *Cost recovery.* Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

(iii) *Telecommunications Relay Services Fund.* Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.

(A) *Contributions.* Every carrier providing interstate telecommunications services shall contribute to the TRS Fund on the basis of interstate end-user telecommunications revenues as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.

(B) *Contribution computations.* Contributors' contribution to the TRS fund shall be the product of their subject revenues for the prior calendar year and a contribution factor determined annually by the Commission. The contribution factor shall be based on the ratio between expected TRS Fund expenses to interstate end-user telecommunications revenues. In the event that contributions exceed TRS payments and administrative costs, the contribution factor for the following year will be adjusted by an appropriate amount, taking into consideration projected cost and usage changes. In the event that contributions are inadequate, the fund administrator may request authority from the Commission to borrow funds commercially, with such debt secured by future years' contributions. Each subject carrier must contribute at least \$25 per year. Carriers whose annual contributions total less than \$1,200 must pay the entire contribution at the beginning of the contribution period. Service providers whose contributions total \$1,200 or more may divide their contributions into equal monthly payments. Carriers shall complete and submit, and contributions shall be based on, a "Telecommunications Reporting Worksheet" (as published by the Commission in the Federal Register). The worksheet shall be certified to by an officer of the contributor, and subject to verification by the Commission or the administrator at the discretion of the Commission. Contributors' statements in the worksheet shall be subject to the provisions of section 220 of the Communications Act of 1934, as amended. The fund administrator may bill contributors a separate assessment for reasonable administrative expenses and interest resulting from improper filing or overdue contributions. The Chief of the Consumer & Governmental Affairs Bureau may waive, reduce, modify or eliminate contributor reporting requirements that prove unnecessary and require additional reporting requirements that the Bureau deems necessary to the sound and efficient administration of the TRS Fund.

(C) *Data collection from TRS Providers.* TRS providers shall provide the administrator with true and adequate data necessary to determine TRS fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS operating expenses and total TRS investment in general accordance with part 32 of the Communications Act, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from TRS providers as necessary to assure the accuracy and integrity of fund payments.

(D) [Reserved]

(E) *Payments to TRS providers.* TRS Fund payments shall be distributed to TRS providers based on formulas approved or modified by the Commission. The administrator shall file schedules of payment formulas with the Commission. Such formulas shall be designed to compensate TRS providers for reasonable costs of providing interstate TRS, and shall be subject to Commission approval. Such formulas shall be based on total monthly interstate TRS minutes of use. TRS minutes of use for purposes of interstate cost recovery under the TRS Fund are defined as the minutes of use for completed interstate TRS calls placed through the TRS center beginning after call set-up and concluding after the last message call unit. In addition to the data required under paragraph (c)(5)(iii)(C) of this section, all TRS

providers, including providers who are not interexchange carriers, local exchange carriers, or certified state relay providers, must submit reports of interstate TRS minutes of use to the administrator in order to receive payments. The administrator shall establish procedures to verify payment claims, and may suspend or delay payments to a TRS provider if the TRS provider fails to provide adequate verification of payment upon reasonable request, or if directed by the Commission to do so. The TRS Fund administrator shall make payments only to eligible TRS providers operating pursuant to the mandatory minimum standards as required in §64.604, and after disbursements to the administrator for reasonable expenses incurred by it in connection with TRS Fund administration. TRS providers receiving payments shall file a form prescribed by the administrator. The administrator shall fashion a form that is consistent with parts 32 and 36 procedures reasonably tailored to meet the needs of TRS providers. The Commission shall have authority to audit providers and have access to all data, including carrier specific data, collected by the fund administrator. The fund administrator shall have authority to audit TRS providers reporting data to the administrator. The formulas should appropriately compensate interstate providers for the provision of VRS, whether intrastate or interstate.

(F) TRS providers eligible for receiving payments from the TRS Fund are:

(1) TRS facilities operated under contract with and/or by certified state TRS programs pursuant to §64.605; or

(2) TRS facilities owned by or operated under contract with a common carrier providing interstate services operated pursuant to §64.604; or

(3) Interstate common carriers offering TRS pursuant to §64.604; or

(4) Video Relay Service (VRS) and Internet Protocol (IP) Relay providers certified by the Commission pursuant to §64.605.

(G) Any eligible TRS provider as defined in paragraph (c)(5)(iii)(F) of this section shall notify the administrator of its intent to participate in the TRS Fund thirty (30) days prior to submitting reports of TRS interstate minutes of use in order to receive payment settlements for interstate TRS, and failure to file may exclude the TRS provider from eligibility for the year.

(H) Administrator reporting, monitoring, and filing requirements. The administrator shall perform all filing and reporting functions required in paragraphs (c)(5)(iii)(A) through (c)(5)(iii)(J) of this section. TRS payment formulas and revenue requirements shall be filed with the Commission on May 1 of each year, to be effective the following July 1. The administrator shall report annually to the Commission an itemization of monthly administrative costs which shall consist of all expenses, receipts, and payments associated with the administration of the TRS Fund. The administrator is required to keep the TRS Fund separate from all other funds administered by the administrator, shall file a cost allocation manual (CAM) and shall provide the Commission full access to all data collected pursuant to the administration of the TRS Fund. The administrator shall account for the financial transactions of the TRS Fund in accordance with generally accepted accounting principles for federal agencies and maintain the accounts of the TRS Fund in accordance with the United States Government Standard General Ledger. When the administrator, or any independent auditor hired by the administrator, conducts audits of providers of services under the TRS program or contributors to the TRS Fund, such audits shall be conducted in accordance with generally accepted government auditing standards. In administering the TRS Fund, the administrator shall also comply with all relevant and applicable federal financial management and reporting statutes. The administrator shall establish a non-paid voluntary advisory committee of persons from the hearing and speech disability community,

TRS users (voice and text telephone), interstate service providers, state representatives, and TRS providers, which will meet at reasonable intervals (at least semi-annually) in order to monitor TRS cost recovery matters. Each group shall select its own representative to the committee. The administrator's annual report shall include a discussion of the advisory committee deliberations.

(I) *Information filed with the administrator.* The administrator shall keep all data obtained from contributors and TRS providers confidential and shall not disclose such data in company-specific form unless directed to do so by the Commission. Subject to any restrictions imposed by the Chief of the Consumer & Governmental Affairs Bureau, the TRS Fund administrator may share data obtained from carriers with the administrators of the universal support mechanisms (*See* 47 CFR 54.701 of this chapter), the North American Numbering Plan administration cost recovery (*See* 47 CFR 52.16 of this chapter), and the long-term local number portability cost recovery (*See* 47 CFR 52.32 of this chapter). The TRS Fund administrator shall keep confidential all data obtained from other administrators. The administrator shall not use such data except for purposes of administering the TRS Fund, calculating the regulatory fees of interstate common carriers, and aggregating such fee payments for submission to the Commission. The Commission shall have access to all data reported to the administrator, and authority to audit TRS providers. Contributors may make requests for Commission nondisclosure of company-specific revenue information under §0.459 of this chapter by so indicating on the Telecommunications Reporting Worksheet at the time that the subject data are submitted. The Commission shall make all decisions regarding nondisclosure of company-specific information.

(J) The administrator's performance and this plan shall be reviewed by the Commission after two years.

(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules.

(6) *Complaints*—(i) *Referral of complaint.* If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously.

(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

(iii) *Jurisdiction of Commission.* After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(1) 180 days after the complaint is filed with such state entity; or

(2) A shorter period as prescribed by the regulations of such state; or

(B) The Commission determines that such state program is no longer qualified for certification under §64.605.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or

any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) *Complaint procedures.* Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) *Informal complaints—(1) Form.* An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(2) *Content.* An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) *Service; designation of agents.* The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) *Review and disposition of informal complaints.* (1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail).

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

(C) *Formal complaints.* A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

(1) The name and address of the complainant,

(2) The name and address of the defendant against whom the complaint is made,

(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(4) *The relief sought.*

(D) *Amended complaints.* An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) *Number of copies.* An original and two copies of all pleadings shall be filed.

(F) *Service.* (1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) *Answers to complaints and amended complaints.* Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) *Replies to answers or amended answers.* Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) *Defective pleadings.* Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

(7) *Treatment of TRS customer information.* Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

[65 FR 38436, June 21, 2000, as amended at 65 FR 54804, Sept. 11, 2000; 67 FR 13229, Mar. 21, 2002; 68 FR 50977, Aug. 25, 2003; 69 FR 5719, Feb. 6, 2004; 69 FR 53351, Sept. 1, 2004; 69 FR 55985, Sept. 17, 2004; 69 FR 57231, Sept. 24, 2004; 70 FR 51658, Aug. 31, 2005; 70 FR 76215, Dec. 23, 2005]

§64.605 STATE CERTIFICATION.

(a) *State documentation*—(1) *Certified state program.* Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned “TRS State Certification Application.” All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

(2) *VRS and IP Relay provider.* Any entity desiring to provide VRS or IP Relay services, independent from any certified state TRS program or any TRS provider otherwise eligible for compensation from the Interstate TRS Fund, and to receive compensation from the Interstate TRS Fund, shall submit documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned “VRS and IP Relay Certification Application.” The documentation shall include, in narrative form:

- (i) A description of the forms of TRS to be provided (*i.e.*, VRS and/or IP Relay);
- (ii) A description of how the provider will meet all non-waived mandatory minimum standards applicable to each form of TRS offered;
- (iii) A description of the provider's procedures for ensuring compliance with all applicable TRS rules;
- (iv) A description of the provider's complaint procedures;
- (v) A narrative describing any areas in which the provider's service will differ from the applicable mandatory minimum standards;
- (vi) A narrative establishing that services that differ from the mandatory minimum standards do not violate applicable mandatory minimum standards;
- (vii) Demonstration of status as a common carrier; and
- (viii) A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.

(b) (1) *Requirements for state certification.* After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

- (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;
- (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

(2) Requirements for VRS and IP Relay Provider FCC Certification. After review of certification documentation, the Commission shall certify, by Public Notice, that the VRS or IP Relay provider is eligible for compensation from the Interstate TRS Fund if the Commission determines that the certification documentation:

(i) Establishes that the provision of VRS and/or IP Relay will meet or exceed all non-waived operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the VRS and/or IP Relay provider makes available adequate procedures and remedies for ensuring compliance with the requirements of this section and the mandatory minimum standards contained in §64.604, including that it makes available for TRS users informational materials on complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where the TRS service differs from the mandatory minimum standards contained in §64.604, the VRS and/or IP Relay provider establishes that its service does not violate applicable mandatory minimum standards.

(c)(1) *State certification period.* State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

(2) *VRS and IP Relay Provider FCC certification period.* Certification granted under this section shall remain in effect for five years. A VRS or IP Relay provider may apply for renewal of its certification by filing documentation with the Commission, at least 90 days prior to expiration of certification, containing the information described in paragraph (a)(2) of this section.

(d) *Method of funding.* Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

(e)(1) *Suspension or revocation of state certification.* The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.

(2) *Suspension or revocation of VRS and IP Relay Provider FCC certification.* The Commission may suspend or revoke the certification of a VRS or IP Relay provider if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. The Commission may, on its own motion, require a certified VRS or IP Relay provider to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a certified VRS or IP Relay provider may not be in compliance with the minimum standards.

(f) *Notification of substantive change.* (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the

state TRS program continues to meet federal minimum standards after implementing the substantive change.

(2) VRS and IP Relay providers certified under this section must notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of when such changes occur, and must certify that the interstate TRS provider continues to meet federal minimum standards after implementing the substantive change.

(g) VRS and IP Relay providers certified under this section shall file with the Commission, on an annual basis, a report providing evidence that they are in compliance with §64.604.

[70 FR 76215, Dec. 23, 2005]

Appendix B: Sprint TRS, STS, CapTel, and VRS Training Outlines

Sprint TRS Training Outline

Module	Module Description
Module 1	Orientation <ul style="list-style-type: none"> Objectives Welcome & History Future of Sprint What is Relay? CA Training Call Flow Chart
Module 2	Phone Image <ul style="list-style-type: none"> Objectives Introduction Communicating Information Using Conversational Tone Managing Dissatisfied Customers
Module 3A	Overview of System and Equipment <ul style="list-style-type: none"> Objectives Logging In Logging Out Screen Display Checking for Understanding Headsets Modem Error Correction Keyboard Last Typed Macro Feature English Macros Spanish Macros Telephony Terms
Module 3B	Interactive Terminals <ul style="list-style-type: none"> Knowing Your TTY Closing a Conversation Typing Background Noises
Module 3C	Overview of System and Equipment (FRS Only) <ul style="list-style-type: none"> Malfunctions Relay Procedures Confidentiality Statistics Handling Obscene Calls Requesting a Supervisor Reporting Macros
Module 4A	Call Processing Procedures <ul style="list-style-type: none"> Objectives Your Role as CA Call Processing for All States

Module	Module Description
Module 4B	Destinations of Traffic <ul style="list-style-type: none"> ▪ Destinations not Allowed ▪ IntraLata Competition ▪ State Differences
Module 4C	Answering Machines and Audiotext <ul style="list-style-type: none"> ▪ Record Feature ▪ Voice Answering Machine ▪ Voice to TTY Answering Machine ▪ Information Line ▪ Audiotext ▪ Voice Mail ▪ Pagers/Beepers (TTY-Voice) ▪ Pagers/Beepers (Voice - TTY) ▪ Variations ▪ Answering Machine Retrieval
Module 4D	Voice Originated Calls <ul style="list-style-type: none"> ▪ Local Call Description ▪ Toll Free and Paid ▪ Paid over Sprint Network ▪ Paid over Alternate Carrier ▪ Variations
Module 4E	Long Distance Calling <ul style="list-style-type: none"> ▪ FONcard ▪ LEC Card ▪ Optional Cards ▪ Pre-Paid Cards ▪ Collect ▪ Third Party ▪ Immediate Credit
Module 4F	VCO and HCO <ul style="list-style-type: none"> ▪ Voice Carry Over (VCO) ▪ Inbound VCO Branding ▪ Busy Line ▪ No Answer ▪ Two-Line VCO ▪ Hearing Carry Over (HCO) ▪ Non-Branded HCO ▪ Branded HCO

Module	Module Description
Module 4G	Alternate Call Types <ul style="list-style-type: none"> ▪ VCO to VCO ▪ VCO to TTY ▪ TTY to VCO ▪ HCO to HCO ▪ HCO to TTY ▪ TTY to HCO
Module 4H	Customer Database <ul style="list-style-type: none"> ▪ Customer Database Feature ▪ Customer Notes Window ▪ UCR Main Menu ▪ Name Submenu ▪ COC Submenu ▪ InterLata COC ▪ IntraLata COC ▪ Billing Method Window ▪ Billing Options ▪ Numbers Submenu ▪ Emergency Numbers ▪ Frequently Dialed Numbers (FD) ▪ Blocked Numbers ▪ Customer Notes
Module 4H	Customer Database <ul style="list-style-type: none"> ▪ Preferences ▪ Answer Type ▪ Language Type ▪ Outdial Restrictions ▪ Macros ▪ Last Number Redial

Module	Module Description
Module 4I	Variations <ul style="list-style-type: none"> ▪ Busy Signals ▪ Poor Connection ▪ No Answer ▪ Request for Information ▪ Speech Impaired ▪ Pacing Voice Customer ▪ Profanity towards CA ▪ Request for M or F CA ▪ CA Knows Customer ▪ Suicide ▪ Abuse ▪ Illegal Calls ▪ Sensitive Topics ▪ Redialing ▪ Switchboards ▪ Young Children ▪ Inbound ASCII ▪ Repeating Information ▪ Request for Relay Number ▪ Restricted Calls ▪ ASCII on Outbound Line ▪ Regional 800 ▪ Two Calling From Numbers ▪ LEC Service Office ▪ Double Letters ▪ Call Waiting ▪ Conference Calls ▪ Three-Way Calling ▪ Changing CAs ▪ 800 Number Referral ▪ Hard-of-Hearing Customer ▪ Call Backs for TTYs ▪ Multiple Calls
Module 4I	Variations <ul style="list-style-type: none"> ▪ Call Modification ▪ Holding ▪ Alternate Language ▪ Typing in Parenthesis ▪ Product Information ▪ Spanish Calls ▪ Voice Customer Hangs Up ▪ Variable Time Stamp ▪ TTY Customer Hangs Up ▪ Conversation being Recorded ▪ Prompting Voice for "GA" ▪ Non-Standard TTY Capability ▪ Internet Characters ▪ TTY does not type "GA" ▪ Cellular Long Distance Calls ▪ Party Line Calls

Module	Module Description
Module 5	Emergency Call Processing <ul style="list-style-type: none"> Emergency Calls Non-Emergency Calls Emergency Incident Form
Module 6A	Performance and Procedures <ul style="list-style-type: none"> Performance Measurement Plan Quality Customer Service Commitment Personal Effectiveness Assessment Survey and Replay Emergency Procedures Emergency Assistance Form Checking for Understanding
Module 6B	Healthy Relay <ul style="list-style-type: none"> Introduction Analogy Stretching Exercises CA Reinforcement Ergonomic Review Setting up Workstation GUAM - Get up and move
Module 6B	Healthy Relay <ul style="list-style-type: none"> Ergonomic Relief Slowing the Customer Overtime Relaxation
Module 7A	Responding Positively <ul style="list-style-type: none"> Stress Management Thoughts and Feelings Relaxing Emotionally Thinking Powerfully Exercise Nutrition Relaxation/Meditation Energy Resource Assessment Suggested Reading Leader's Notes
Module 7B	Healthy Detachment <ul style="list-style-type: none"> Interactive Communication TDD Communication Potential Stressors Detaching
Module 8	Assessing Performance <ul style="list-style-type: none"> Assessment Process Coaching Feedback Pass/Fail Guidelines Role Plays

Module	Module Description
Module 9	Supervisor as Trainer and Coach <ul style="list-style-type: none"> ▪ Introduction ▪ Objectives ▪ Being a Coach/Trainer ▪ An Adult Learner ▪ Giving Effective Instruction ▪ Feedback
Module 10	A Healthy Approach to Relay <ul style="list-style-type: none"> ▪ Learning Continuum ▪ Adult Education ▪ Dale's Cone of Experience ▪ Elements of Lesson Design ▪ Preparation for Training ▪ Warm Ups ▪ Voice Inflection ▪ Handling Interruptions ▪ Prep for Final ▪ Hearing Thru (TDD - Voice) ▪ Hearing Thru (Voice - TDD) ▪ Voice Thru (TDD - Voice) ▪ Voice Thru (Voice - TDD) ▪ Audiotext ▪ Information Lines ▪ Business Answering Machines ▪ Residential Answering Machines ▪ Beepers ▪ Spanish Answering Machine ▪ TTY Answering Machine

Speech-to-Speech Training Outline

Module 1	Orientation <ul style="list-style-type: none"> ▪ Objectives ▪ Welcome & Introductions ▪ Description ▪ History 	What is Speech to Speech Differences from Relay Agent Training
Module 2	Speech to Speech Customers <ul style="list-style-type: none"> ▪ Objectives ▪ Introduction ▪ Phone Image ▪ Characteristics of Speech to Speech Customers ▪ Breaking the Stereotypes 	Varying Speech Patterns Voice Synthesizers Types of Calls Transparency & Confidentiality Phrases
Module 3	Attributes of STS CAs <ul style="list-style-type: none"> ▪ Objectives ▪ Patience ▪ Concentration ▪ Listening Skills 	Caller Control Sensitivity and Understanding
Module 4A	Call Processing Procedures <ul style="list-style-type: none"> ▪ Objectives ▪ Your Role as CA ▪ Billing ▪ Directory Assistance ▪ Changing CAs 	
Module 4B	Answering Machines and Audiotext <ul style="list-style-type: none"> ▪ Answering Machines ▪ SA to SD Answering Machine ▪ Busy/Disconnects ▪ Audiotext Message ▪ Pagers/Beepers 	
Module 4C	Emergency Call Processing <ul style="list-style-type: none"> ▪ Emergency Services ▪ EM Numbers ▪ Emergency Incident Form 	
Module 4D	Variations <ul style="list-style-type: none"> ▪ Outbound to Relay ▪ Personal Conversations ▪ Operator Calls ▪ Talking on Hold ▪ Keeping the Customer Informed ▪ Differentiating STS and Relay ▪ Outdialing to STS 	Using GA Spelling Announcement 900 Calls Request to Hold SD to SD through STS Non STS Calls

Sprint CapTel Training Outline

1.0 Training Summary Outline

1.1 Introduction/Tour

Introductions: Lead trainer, training assistant, Call Center director, and other administrative personnel that may be involved in the first day of training. Prospective CAs are given a tour of the building and the facilities. Each individual is given a security passkey and shown how to use it. The CTI building is a secured facility and the passkey is needed to enter the parking lot after normal business hours, enter the building and gain access to the Call Center floor by stairway or elevator.

1.2 Human Resources Overview

The Human Resource coordinator meets with each group to go over required employment paperwork for the State of Wisconsin, Call Center policies, non-disclosure agreement, confidentiality requirements, expected standards that must be met to pass out of training, and current scheduling needs.

1.3 Videos

Several videos are shown to better demonstrate the job of a CA and how the technology works and how it provides improved communication for our clients. After each video, questions are answered or clarified as needed.

1.4 Mini Demonstration *CapTel*/Phone

A brief explanation of the *CapTel* phone and the captioning system is given including commonly used terminology when referring to each party involved in a call. Each trainee is then able to place a short call to experience using the *CapTel* phone. This helps individuals to better understand what we are asking them to provide our clients and what the client experiences.

1.5 Introduction - Developing a Personal Voice Profile

Developing a personal voice profile is the most important step to successfully process *CapTel* calls. CAs are given specific instruction as to how to speak, how to sit, and how to utilize the computer and headset to gain optimal accuracy.

1.6 Introduction - Training Program

The *CapTel* training program allows individuals to listen to various pre-recorded scripts and “re-voice” what they hear directly into the recognition program. Individuals are coached to focus on developing the proper re-voicing technique. This simulates the conversation or voice of the hearing person and having to repeat those words to the

computer accurately. Through the progression of various training scripts CAs work to improve their speed of speech while maintaining accurate pronunciation of words based on each script.

1.7 Introduction -- Call Handling Tools

Macros are utilized to aid in the speed and accuracy of calls. CAs listen to pre-recorded scripts that consist mainly of macro type words and learn to utilize the macros accordingly.

1.8 Introduction -- Call Handling Skills -- Pacing a Conversation

CAs are introduced to further call handling skills that allow them to pace various calls in order to provide accurate captions.

1.9 Introduction -- Call Handling Skills -- Inserting Words

CapTel trains its CAs to insert particular words that the Voice Recognition software is not able to caption successfully or in a consistent manner. These words include such things as people's names and regional cities and towns.

1.10 Introduction -- How to Handle Various Recordings

CAs are introduced to various types of calls and how to handle each. The importance of verbatim transcription, confidentiality, accuracy and speed are reviewed. CAs view a demonstration by the training assistant, and then each CA is assigned scripts relating to answering machines and automated recordings.

1.11 Introduction & Demo of *CapTel* Conversation

Each trainee observes each end of the "telephone call" (CA, *CapTel* user, hearing person). Each CA assists in making "live" calls to other trainees. This encourages each CA to observe and experience what our clients experience on every call. It also allows the CA who is captioning an opportunity to practice their learned techniques on more realistic, true to life calls.

2.0 Introduction to Call Simulation

Live call simulation allows CAs to gain exposure to real incoming calls landing on the production floor; however, it does not interfere with the quality of captions going to the *CapTel* user. New CAs are paired with experienced CAs on the production floor to observe and listen to live calls.

2.1 Call Simulation -- Timings

CAs are placed into a rotation of call simulation and receive their first official timing for speed and accuracy baseline timings to provide a

progress report for each CA and develop a list of improvement areas. This measures the quality and accuracy of re-voicing.

2.2 Review of Baseline Timings

Training Scripts are assigned to the group. One at a time, each CA meets with the trainer to review their baseline timings. Feedback and review of standards and expectation are given.

2.3 Introduction to Correction Tool

The correction tool is introduced to provide CAs with another opportunity to provide the highest quality captions.

2.4 Review Training Elements

CAs meet as a group with the trainer to review the various elements that enable them to provide the quality of captions we expect from each CA.

3.0 Monthly Timing Policy

CTI's monthly timing policy is reviewed with all CAs. The importance of successfully passing these timings is emphasized.

3.1 Call Simulation -- Timings

CAs are placed into a rotation of call simulation and receive an official timing. This second timing is a baseline timing in which re-voicing accuracy and call handling skills along with the ability to correct errors are evaluated. Each CA is unaware of when the timing will occur.

4.0 Production Floor Orientation

Current supervisors meet with the group of CAs to go over specific Call Floor procedures, expectations, break adherence, time clock, lockers, emergency plans, and point of contact individuals for questions and assistance.

CAs continue to progress onto the production floor and practice in the training room as needed. CAs are timed each day and progress is reviewed until a CA meets the expected standards or it is determined the individual is not suited for the position. Action is taken as necessary.

Video Relay Service Training Outline and Qualifications

All Sprint VRS interpreters are qualified and will adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. The VRS interpreter qualifications are listed below:

- Certified by the NAD at levels III, IV, or V or certified by RID as IC/TC, CI, CSC, LSC or MSC or demonstrated State equivalent. (Note: In rare instances, VIs may process Sprint VRS calls prior to certification based on qualifications and interpreting skills).
- Possess English language skills at a college level.
- Observe strict confidentiality guidelines using RID's Code of Professional Conduct.
- Function in a totally transparent mode.
- Possess strong receptive and voicing skills.
- Possess sensitivity to the needs of the Deaf, Hard of Hearing and hearing parties
- Have a wide range of experience working in the deaf community utilizing ASL, PSE and Signed English Community utilizing ASL, PSE and Signed English communication modes in social, economic, and educational settings.
- Possess interpreting experience for persons who have minimal language skills.
- Possess computer literacy, including familiarity with current Windows operating systems, and be able to operate computer and video equipment.
- Exhibit superior customer service skills.
- Posses the skill to conduct video interpretation sessions with a wide range of individuals.
- Have a good command of English grammar and composition.
- Possess clear and articulate voice communications.
- Be familiar with speech and disability cultures, languages, and etiquette.
- Possess the ability to work under pressure.
- Be capable of working in a multi-tasked environment.
- Have the skill to conduct telephone conversations with a wide range of individuals.
- Be a citizen of the United States or an alien who has been lawfully admitted for permanent residence as evidenced by the INS Permanent Resident Card (INS Form I-551).
- Successfully completed, as a minimum, training to include deaf culture, American Sign Language, sensitivity to the capabilities and needs of people with speech impairments, the VI's role in the relay process, and training in interpersonal skills to handle difficult or stressful conversations.
- Beginning college level skills in English grammar and diction.

Appendix C: TRS Pledge of Confidentiality

RELAY CENTER CODE OF ETHICAL BEHAVIOR

AS PART OF THE RELAY SERVICES ORGANIZATION, ALL EMPLOYEES, CONTRACTORS AND VISITORS ARE BOUND TO THE LAWS OF THE STATE AND THE FOLLOWING GUIDELINES:

1. ALL TELECOMMUNICATIONS RELAY SERVICE CALL RELATED INFORMATION IS TO BE STRICTLY CONFIDENTIAL. The employee, contractor or visitor shall not reveal any information acquired during or observing a relay call. Any call-related questions or problems are to be discussed with management.
2. NOTHING IS TO BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall transmit exactly what is said in the way that it is intended in the language of the customer's choice.
3. NOTHING IS TO BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall not advise, counsel, or interject personal opinions, even when asked to do so by the consumer.
4. TO ASSURE MAXIMUM USER CONTROL, THE EMPLOYEE WILL BE FLEXIBLE IN ADAPTING TO THE CONSUMER'S NEEDS.
5. EMPLOYEES WILL STRIVE TO FURTHER COMPETENCY IN SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.

I have read and understand the Relay Center Code of Ethical Behavior. I agree to comply with this Code and any applicable State and Federal laws pertaining to Telecommunications Relay Services and understand that failure to do so will lead to company disciplinary action that may result in my termination and criminal prosecution.

EMPLOYEE/CONTRACTOR/VISITOR SIGNATURE DATE

MANAGER/SUPERVISOR SIGNATURE DATE

CapTel CA Pledge of Confidentiality

Confidentiality Policy

- I will not disclose to any individual (outside of a member of the *CapTel* management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any *CapTel* call.
- I will not act upon any information received while processing a *CapTel* call.
- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at *CapTel* Inc.
- I will not share any information about *CapTel* calls with anyone except a member of the *CapTel* Inc. management staff in order to investigate complaints, technical issues, etc.
- I will continue to hold in confidence all information related to the work and calls I have performed while at *CapTel* Inc. after my employment ends.
- I will never reveal my Captionist ID number in conjunction with my name unless asked by a member of the *CapTel* Inc. management staff.
- I will not share with anyone any technical aspect of my position at *CapTel* Inc. unless asked by a member of the *CapTel* Inc. management staff.

- I will not talk about consumers or call content with any fellow Captionists.
- I will not listen to or get involved in calls taken by fellow Captionists.

I have read the above Confidentiality Policy and understand a breach of confidentiality will result in disciplinary action up to and including termination of employment at *CapTel* Inc. I recognize the serious and confidential nature of my position and therefore promise to abide by these guidelines.

Employee Name

Date

Appendix D: E 911 Call Procedure

Sprint uses a system for incoming emergency calls that automatically and immediately transfers the relay user to the nearest Public Safety Answering Point (PSAP). Sprint considers an emergency call to be one in which the user of the relay service indicates they need the police, fire department, paramedics, or ambulance. The following steps will be taken to connect the caller to the correct PSAP:

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a “hot key.”
- The CA’s terminal sends a query to the E911 database containing the caller’s geographic area ANI.
- The database responds with the telephone number of the PSAP that covers the geographic source of the call, and then, automatically dials the PSAP number, and automatically passes the caller’s ANI to the E911 service center.

The CA remains on the line until emergency personnel arrive on the scene unless previously released by the caller. The CA also verbally passes the caller’s ANI onto the E911 center operator. If the inbound relay caller disconnects prior to reaching E911, the CA will stay on the line to verbally provide the caller’s ANI to the E911 center operator.

When a *CapTel* user dials 9-1-1, Sprint will route the call directly to the most appropriate PSAP. The 911 PSAP center will receive the caller’s Automated Number Identification and Automated Locator Identification. If the call is disconnected, the E911 center will call the *CapTel*/user back.

If a *CapTel* user has only one line connected to his or her *CapTel* phone, captions will not be engaged on the call. A prompt on the phone will instruct the *CapTel* user how to communicate with the E911 center to request Voice Carry-over communications to begin. The PSAP would be engaged in typing directly to the user, and the user would be able to speak to the E911 dispatcher.

Appendix E Sprint Carrier-of-Choice Letter of Invitation



(date)

(name)

(Company name)

(address)

(telephone)

(fax)

(e-mail address)

Re: (Customer's name and phone number – requested
LEC for COC)

Thank you for your interest to complete (Company Name) Long Distance calls with Sprint Telecommunications Relay Service (TRS). As the default Toll carrier for processing relay calls in more than thirty-two states (32), Sprint currently transports the traffic of customers who have selected you as their Toll carrier. However, many of your customers would prefer to use (Company Name) LD for their toll calls. At present, Sprint TRS is unable to send the toll calls from the regional centers or state access tandem to your network. Hence, this letter is being written to make you aware of a potential service-impacting issue regarding TRS calls and measures your company can take to ensure your customers' toll calls are completed through TRS.

The Americans with Disabilities Act of 1990 mandate TRS, and TRS standards are established and are monitored by the Federal Communications Commission (FCC). TRS is a service that links telephone conversations between standard (voice) telephone users and people who are deaf, hard of hearing, deaf-blind, or speech disabled using Text Telephone (TTY) equipment. The State Public Utilities Commission manages the day-to-day operations of TRS and has contracted with Sprint Corporation to provide relay service in their states.

Both, the Americans with Disabilities Act of 1990 and FCC's Order 00-56 on TRS mandate that all states provide TRS and that TRS users shall have equal access to their chosen interexchange carrier and to all other operator services, to the same extent that such access is provided to voice users. In order to provide this access to your customers, your company is encouraged to submit a letter of authorization to accept TRS calls from Sprint.

Attachment A lists the facility-based providers who currently participate at Sprint TRS Carrier of Choice program. If your company (or your facility based provider) is

not currently listed, please review the following and determine the appropriate follow-up action needed to be taken:

Facility-based provider

1. If you are a participating member at Sprint Carrier of Choice program, please disregard.
2. If you are not a participating member at Sprint Carrier of Choice program, you need to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Non-facility based provider

1. If your underlying toll carrier is a participating member at Sprint Carrier of Choice program, Sprint can implement the IXC brand name and pass the toll call information to the underlying carrier's CIC code. Please submit a letter of authorization that would advise Sprint to implement the carrier brand name and to send the toll call information to its underlying toll carrier.
2. If your underlying toll carrier is not a participating member at Sprint Carrier of Choice program, you will need to work with your underlying toll carrier to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Before you submit a letter of authorization to Sprint TRS, please consider the following four factors:

3. Your CIC codes or your underlying toll carrier CIC codes associated with 1+, 0+, and 0- and International dialing must be loaded into the regional (and/or state) access tandems.
4. You or your underlying toll carrier will need to support SS7 tandem interconnection.
5. You or your underlying toll carrier will need to ensure that your translation tables are updated in order to appropriately receive, rate, and bill Sprint calls per Bellcore industry standards. Sprint calls are designated as ANI II Digit Pair 60, 66, and 67.
6. If you utilize more than one underlying toll carrier to carry the toll traffic, select a single toll carrier that will accept Sprint traffic.

***Note:** For detailed information regarding access tandem interconnection and carrier of choice provisioning through Sprint, please refer to ATIS/NIIF-008, the "Telecommunications Relay service – Technical Needs" document.*

Attachment B lists Access Tandem Interconnection locations which Sprint TRS is connected with. The best way to provide access to your Toll network through relay service for your customers is to designate the 13 Sprint Regional TRS center/Access

Tandem combinations as the points at which Sprint will hand off Toll relay service traffic to you. In this manner, any relay caller that wishes to use your services may be efficiently, and with minimal time delay, routed to your network. Should you not have a presence at one or more of the Sprint regional center/access tandem combinations, the traffic may be handed off at one of the regional center's access tandem.

Attachment C is a sample letter of authorization. Once Sprint receives your written request to participate in the Sprint TRS Carrier of Choice program, Sprint will schedule translation updates in the next available release (usually 45 to 90 days).

Information obtained from the carriers will be used solely for the purpose of providing equal access for (Company Name) LD customers and shall be held proprietary.

Sprint welcomes your company's participation in our TRS Carrier of Choice program at **no cost** to you if your company has network presence at any of our listed regional center/state access tandem locations. Your participation at the Sprint Carrier of Choice program will create a win-win situation for our customers. Through Sprint, as the relay provider, customers will be able to enjoy uninterrupted service and your company will be able to generate additional revenue.

Thank you for your prompt attention to this matter. If you have any questions concerning with the letter, please do not hesitate to call (Account Manager) at (phone number) or email at (e-mail address).

Sincerely Yours,

(your name)

CC: Michael Fingerhut, Federal Regulatory, Sprint
Angela Officer, Program Manager, Sprint

Attachment A

Current participating members (facility-based providers) at Sprint TRS Carrier of Choice:

<u>Entity</u>	<u>CIC Code</u>
AT&T Communications	0288
Bell South Long Distance	0377
Bestline	0302
Birch Telecom	0678
Broadwing Communications	0948
Broadwing Telecommunications	0071
Cox Communications	6269
Excel Telecommunications, Inc.	0752
Global Crossings Telecommunications	0444
MCIWorldCom	0222
McLeod USA	0725
Qwest Communications	0432
SBC Communications Long Distance	5792
Souris River Telecommunications	0770
Sprint	0333
Telecomm*USA (MCIWorldCom)	0220, 0321, 0835, 0987
Touch America Services, Inc.	0244
U.S. Link	0355
VarTec dba Clear Choice Communications	0636
VarTec Telecom, Inc.	0465, 0638, 0811, 0899, 5111
Verizon Long Distance	5483
Winstar	0643
Working Assets	0649
WorldCom	0555, 0987
WorldXChange	0502, 0834

Updated: 8/12/07

Attachment B

Access Tandem Interconnection Locations

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern B
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac B
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated: 8/12/07

Attachment C

S A M P L E Letter of Authorization

< DATE >

<Name>, Account Manager

<Street1> <Street2>

<City>, <State> <Zip Code>

FAX: <Fax. No.>

This letter of authorization has been issued to give Sprint TRS permission to send < Toll Carrier Company Name > toll traffic associated with 1+, 0+, and 0- and International dialing through Sprint TRS at the < Regional COC Tandems >.

1. Regional COC Tandems

You will need to provide Sprint with the following:

Toll Carrier: < insert name>

CIC Code: <insert CIC>

Underlying Toll Carrier: <insert name>

Underlying Carrier CIC Code: <insert CIC>

Choose Tandem Below

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTN OH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern B
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac B
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated 8/12/07

2. Call Type Restrictions

< Toll Carrier Brand Name > will accept any intrastate, international and operator services call types that will be routed to the < tandem location(s) > tandems.

OR

< Toll Carrier Brand Name > will accept any (*specify intrastate, interstate, international, and operator services*) call types except for (*specify what call types and restrictions*) that should not be routed to the < tandem location > tandems.

If there are any questions regarding this letter of authorization, please contact < Name >, < Job Title >, < Department Name > at xxx-xxx-xxxx.

Sincerely, < Name >< Job Title >, < Department Name >

Appendix F: Sprint Outage Prevention Program

Call Before You Dig Program

This program uses a nationwide 800 number interlinked with all local/state government utility agencies as well as contractors, rail carriers, and major utilities. Sprint currently receives in excess of 60,000 calls per month for location assistance over the 23,000-mile fiber network.

Awareness Program

This Sprint program proactively contacts local contractors, builders, property owners, county/city administrators, and utility companies to educate them on Sprint's cable locations and how each can help eliminate cable outages.

Route Surveillance Program

This is a Network Operations Department program using Sprint employees to drive specific routes (usually 120 miles) and visually inspect the fiber cable routes. This activity is performed an average of 11.6 times per month or approximately once every 2-3 days.

Technician Program

Technicians are stationed at strategic locations and cover an area averaging 60 route miles. Each technician has emergency restoration material to repair fiber cuts on a temporary basis. Other operations forces within a nominal time frame accomplish total repair.

Fiber/Switch Trending Program

This includes a weekly summary of equipment failure events highlighting bit error rate (BER) and cable attenuation. As a result, Sprint identifies potential equipment problems and monitors performance degradation to establish equipment-aging profiles for scheduled repair, replacement, or elimination. Aging profiles are computer-stored representations of the characteristics of a fiber splice. The profile is stored at the time the splice is accepted and put into service. A comparison of the original profile and current profile are compared for performance degradation. Maintenance is scheduled based on this type of monitoring.

Network Management and Control Systems

The Sprint network is managed and controlled by a National Operations Control Center (NOCC) located in Overland Park, KS. As a back up, a secondary NOCC is located in Lenexa, KS. The NOCC is designed to provide a national view of the status of the network as well as to provide network management from a centralized point. The NOCC interfaces with the Regional Control Centers (RCCs) to obtain geographical network status. The RCCs are responsible for maintenance dispatch and trouble resolution, and are designed to provide redundancy for each other and back-up status for the NOCC.

The NOCC and RCC work closely with the ESOCC in cases where a network problem may affect Vermont operations. In cases such as these, the NOCC or RCC immediately alerts the ESOCC of the situation so that appropriate steps can be taken to minimize service impacts. The NOCC and RCCs also serve as reference points for the ESOCC when problems are detected in the TRS center that are not the result of internal center operations.

Network Management

Commitment to a digital fiber optic network permits Sprint to use a single transmission surveillance protocol to integrate internal network vendor equipment. This enhances Sprint's ability to automate and provide preventive, near-real-time detection and isolation of network problems. The controlling principle is identification and correction of potential problems before they affect Vermont call capabilities.

Sprint divides the major functional responsibilities, facilities maintenance and network management into a two-level organization that maximizes network efficiencies and customer responsiveness. The first level consists of the RCCs located in Atlanta and Sacramento. RCC personnel focus on the performance of individual network elements within predetermined geographical boundaries. The second level is the NOCC in Kansas City that oversees traffic design and routing for Sprint's 23,000-mile fiber optic network and interfaces.

This two-level operational control organization, combined with architectural redundancies in data transport and surveillance, control and test systems, ensures an expedited response to potential problems in both switched and private line networks.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the center's operation is maintained. This includes:

- Switch system and peripherals
- Switch room environmentals
- CA positions (consoles/terminals and emergency lights)
- Emergency lights (self-contained batteries)
- System alarms
- CDR recording

As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the backup generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental control until commercial power is restored.

CAPTEL OUTAGE PREVENTION

Sprint will provide FCC compliant *CapTel* service from the two *CapTel* Service Centers in Madison and Milwaukee, WI. Sprint's *CapTel* vendor, *CapTel, Inc.* (CTI), operates the two current *CapTel* Service Centers in the nation. These unique centers operate with enough terminals for 200 agents each, along with support personnel, technicians, and supervisors.

Both *CapTel* Service Centers are equipped with redundant systems for power, ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

Having two *CapTel* Service Centers ensures minimum interruptions in service if something unexpectedly halts operations in one center, such as a flood or a tornado. In those instances, traffic from one center can automatically be routed to the other.

Appendix G: Disaster Recovery Plan

Sprint's comprehensive Disaster Recovery Plan developed for Vermont details the methods Sprint will utilize to cope with specific disasters. The plan includes quick and reliable switching of calls, network diagrams identifying where traffic will be rerouted if vulnerable circuits become inoperable, and problem reporting with escalation protocol. Besides service outages, Sprint's Vermont Disaster Recovery Plan applies to specific disasters that affect any technical area of Sprint's Relay network.

The first line of defense against degradation is the Intelligent Call Router (ICR) technology that Sprint employs. During a major or minor service disruption, the ICR feature bypasses the failed or degraded facility and immediately directs calls to the first available agent in any of Sprint's eleven fully inter-linked TRS Call Centers. State-specific call processing software resides at each of Sprint's Relay Call Centers. Communications Assistants (CAs) are trained in advance to provide service to other states; the transfer of calls between centers is transparent to users.

Beyond the ICR, Sprint's Disaster Recovery Plan details the steps that will be taken to deal with any problem, and restore Vermont to its full operating level in the shortest possible time.

State Notification Procedure

To provide Vermont with the most complete and timely information on problems affecting its TRS, the trouble reporting procedure will include three levels of response:

- A 3-hour verbal report
- A 24-hour status report
- A comprehensive final report within 5 business days

Sprint will notify the VDPS within three hours if a service disruption of 30 minutes or longer occurs. For service disruptions occurring outside normal business hours, the initial report will be provided by 8:30 AM on the next business day. This initial report will explain how the problem will be corrected and an approximate time when full service will be restored. Within 24 hours of the service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals that the problem has been corrected and that full service to Vermont has been restored. The final comprehensive written report, explaining how and when the problem occurred, corrective action taken, and time and date when full operation resumed will be provided to the Vermont Contract Administrator within five business days of return to normal operation. Examples of service disruption include:

- ACD failure or malfunction
- Major transmission facility blockage
- Threat to Vermont CAs' safety or other CA work stoppage
- Loss of CA position capabilities

Performance at each Sprint relay center is monitored continuously 24 hours a day, seven days a week from Sprint's Enhanced Services Operation Control Center (ESOCC) in Overland Park, KS.

Disaster Recovery Procedures

If the problem is within the relay center serving Vermont, maintenance can usually be performed by the on-site technician, with assistance from Sprint's ESOCC. If the problem occurs during non-business hours and requires on-site assistance, the ESOCC will page the technician to provide service remedies. Sprint retains hardware spares at each center to allow for any type of repair required without ordering additional equipment (except for complete loss of a center).

Time Frames for Service Restoration

Complete or Partial Loss of Service Due to Sprint Equipment or Facilities

- **Sprint Call Center Equipment** - A technician is on-site during the normal business day. The technician provides parts and/or resources necessary to expedite repair within two hours. Outside of the normal business day a technician will be on-site within four hours. The technician then provides parts and /or resources necessary to expedite repair within two hours.
- **Sprint or Telco Network Facilities** - For an outage of facilities directly serving Vermont, incoming TRS calls will immediately be routed to one of ten other centers throughout the United States. No calls will be lost. Repair of fiber or network facilities typically requires less than eight hours.
- **Due to Utilities or Disaster at the Center** - Immediate rerouting of traffic occurs with any large-scale center disaster or utility failure. Service is restored as soon as the utility is restored, provided the Sprint equipment

has not been damaged. If the equipment has been damaged the service restoration for Sprint equipment (above) applies.

- **Due to Telco Facilities Equipment** - A Telco equipment failure will not normally have a large effect on TRS traffic within the state unless it occurs on Telco facilities directly connected to the call center. In this case, normal Sprint traffic rerouting will apply. For a failure at a Telco central office - in Burlington, for example, only local Burlington residents would be affected until the Telco has performed the necessary repairs. For situations like this, it will be at Sprint's discretion to dispatch a technician. The normal Telco escalation procedures will apply. The Telco escalation process is all during the normal business day; therefore, a trouble may be extended from one day to the next.

Trouble Reporting Procedures

The following information is required when a Vermont relay user is reporting trouble:

- Service Description
- Caller's Name
- Contact Number
- Calling to/Calling from (if applicable)
- Description of the trouble

Service disruptions or anomalies that are identified by Vermont relay users may be reported to the Sprint Relay Customer Service 800 number (800-877-0996) at any time, day or night, seven days a week. The Customer Service agent creates a trouble ticket and passes the information on to the appropriate member of Sprint's Maintenance Team for action. Outside the normal business day, the ESOC will handle calls from the Customer Service agents 24 hours a day, 7 days a week. The Maintenance Team recognizes most disruptions in service prior to customers being aware of any problem. Site technicians are on call at each of Sprint's 11 TRS Call Centers to respond quickly to any event, including natural disasters.

Mean Time to Repair (MTTR)

MTTR is defined and detailed in Tables A-1 and A-2:

Table A-1 Time to Investigate + Time to Repair + Time to Notify

Time to Investigate	The time needed to determine the existence of a problem and its scope.
Time to Repair	Repair time by Field Operations plus LEC time, if applicable.
Time to Notify	From the time repair is completed to the time the customer is notified of repair completion.

Table A-2 Current MTTR Objectives

Switched Services	8 Hours
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Private Lines	4 Hours (electronic failure)
Fiber Cut	8 Hours

Sprint's Mean Time to Repair is viewed from the customer's perspective. A critical element in the equation is the Time to Notify, because Sprint does not consider a repair complete until the customer accepts the circuit back as satisfactory.

Escalation Procedures

If adequate results have not been achieved within two hours, a Vermont relay user may escalate the report to the next level. Table A-3 details the escalation levels.

Table A-3 Escalation Levels

Escalation Level	Contact	Phone
2	Regional Maintenance Manager	Office Phone Number (913) 253-4394 Cell Phone Number Cell Phone 913-484-2263
3	Senior Manager, Technical Staff	Office Phone Number (913) 253-4396

Service Reliability

Sprint's service is provided through an all-fiber sophisticated management control networks support backbone networks with digital switching architecture that. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber optic network, with significant fiber miles in Vermont, provides critical advantages over the other carriers. These advantages include:

- **Quality**

Since voice or data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

- **Economy**

The overall quality, architecture, and advanced technology of digital fiber optics makes transmission so dependable that it costs us less to maintain, thereby passing the savings onto our customers.

- **Expandability**

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

- **Survivability**

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to Vermont, and a competitive differentiation of the Sprint network.

Currently, Sprint has over 23,000 miles of its fiber network in place and in service, with a fiber point of presence (POP) in every Local Access Transport Area (LATA). The single LATA in Vermont is served by two Sprint POPs, located in Alburg and Essex Junction, Vermont. There are plans for additional fiber mileage, additional POPs, and added route diversity. There are more than 300 POPs in service on the network.

Switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services. Vermont would primarily be served by the DMS switches in Springfield, Massachusetts, with other diversely located facilities also serving the state.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies such as Digital Cross-connect Systems, SONET, and Signaling System 7.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control centers. These factors combine to assure outstanding network performance and reliability for Vermont.

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the United States. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Sprint Outage Notification from *CapTel*/Service Center

Performance at the *CapTel*/Service Center is monitored continuously by CTI technicians 24 hours a day, seven days a week. Sprint will be notified by the *CapTel*/Service Center Manager immediately upon determination of any type of natural or man-made problem that causes either:

- A complete (100 percent) loss of the *CapTel*/Service Center, OR
- Any partial loss of service in excess of 15 minutes that is service affecting. Examples of such a loss in service include:
 - An accidental switch rebooting
 - Loss of transmission facilities through the telephone network
 - Terrorist attack
 - Bomb threat or other work stoppage
 - Sudden loss of agent position capabilities.
 - Impact to minimum ASA/Speed of Answer times
 - Acts of God

Contact from the *CapTel*/Service Center Manager or designated CTI contact person will be made to the assigned contact people at Sprint immediately upon awareness of an outage meeting the above criteria, 24 hours a day, seven days a week including holidays with the following documentation:

- 1) What time did the outage happen in CENTRAL TIME?
- 2) What caused it?
- 3) Which customers are (or were) impacted?
- 4) What is (was) the solution to restore service?
- 5) What is the time that service will be (or was restored by) IN CENTRAL TIME?

Sprint Procedure for Outage Notification to Contract Administrators during Business Hours

Upon receiving notification from CTI during business hours (8AM to 5PM CT), Sprint will have one of the below managers contact the Contract Administrator, depending on availability:

	Point of Contact (POC)	Position	Contact Information:
1	John Moore	Relay Program Management Mgr	P: (925) 468-4345 M: (925) 895-9176 E: John.E.Moore@sprint.com
2	Angela Officer	Relay Program Manager	P: (703) 689-5654 E: Angela.Officer@sprint.com
3	Assigned On-Call Relay Program Manager	Relay Program Manager	Assigned as necessary

Upon receiving notification from CTI, Sprint will assess the problem and contact will be made by email to the Contract Administrator.

In cases of partial loss of service, such as several inoperable CA positions or, local area network outages, the *CapTel* Center on-site technician will notify *CapTel* Service Center to schedule repair. Only those partial losses of service that are service affecting in excess of 15 minutes will be email to the state Contract Administrator.

If the problem is within the *CapTel* Center, maintenance can usually be performed by the on-site technicians. Hardware spares are retailed at the *CapTel* Service center to allow for the most common type of repair required without the ordering of additional equipment.

Sprint Procedure for Outage Notification to Contract Administrators outside of Business Hours

Upon receiving notification from CTI outside of business hours (5PM to 8AM CT, Monday through Friday, and all day Saturday, Sunday and holidays), John Moore (or Angie Officer) will notify Contract Administrators immediately by email of an outage if possible, but by no later than 8AM CT the next business day. Follow-ups and post-mortem will still be provided within the required guidelines.

Disaster Recovery Follow-Up

Upon notifying customers of an outage, Sprint's contact person will provide regular updates from CTI to all customers and internal team members. The follow up will be kept in sync with *CapTel* Customer Service so that the information shared with customers from CTI is the same as what customers receive from Sprint.

Disaster Recovery Post-mortem Documentation

72 hours (3 days) after the outage is resolved, CTI will need to provide a formal written analysis of the outage to the designated Sprint people (outlined above).

Sprint will send a document with the analysis to the Contract Administrator. John Moore will be the primary point of contact for the letter to be shared with customers. If John Moore is not available, then Angie Officer will provide the letter directly to customers.

- 1) What time did the outage happen in CENTRAL TIME?
- 2) What caused it?
- 3) Which customers are or were impacted?
- 4) What is the solution to restore service?
- 5) What is the time that service will be or was restored IN CENTRAL TIME?
- 6) What will *CapTel*, Inc do to prevent this from happening again?

CTI will be available to answer questions from Contract Administrators through Sprint.

Time Frames for Service Restoration

Complete loss of service due to equipment -

- Normal business day – A technician is on site during the normal business day. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.
- Outside of the normal business day – A technician will be on-site within four (4) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

Due to Utilities or Disaster at the Center – Service will be restored as soon as the utility is restored provided the equipment was not damaged. If the equipment was damaged then refer to the timing in the statement previous (Due to Equipment).

Due to Telco Facilities Equipment – A technician will be dispatched as necessary. The normal Telco escalation procedures for a partial outage will apply:

- Two hours at first level
- Four hours at second level
- Eight hours at third level

These hours of escalation are all during the normal business day, so a trouble ticket may be extended from one day to the next.

Partial loss of service – Due to Equipment

- Normal business day – A technician is on site during normal business hours. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.
- Outside of the normal business day – A technician will be on-site within eight (8) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.

Due to Position Equipment – A technician will be on-site within eight (8) hours, provided there are not enough positions working to process the forecasted traffic volumes. The technician will provide parts and/or resources necessary to expedite repair within 48 hours. If there are enough positions functional to process the forecasted traffic, the equipment will be repaired as necessary by Sprint.

Due to Telco Facilities Equipment – A technician will be dispatched as necessary by Sprint. The normal Telco escalation procedures for a partial outage will apply:

- Eight hours at first level
- Twenty-four hours at second level

These hours of Telco escalation are all during the normal business day, so a service request may be extended from one day to the next.

Trouble Reporting Procedures (for Individual Customers to Customer Service)

All calls concerning customer service issues should be placed by dialing the *CapTel* Customer Service number at 1-888-269-7477 (800-482-2424 TTY) in English only. A Customer Service agent will take information concerning:

- Caller's Name
- Contact Number
- Calling to/Calling from (if applicable)
- Description of the trouble

Report service-affecting trouble to Customer Service during normal business hours, 8:00 AM to 5:00 PM Central Time, Monday through Friday. Normal business hours do not include Saturday, Sunday, and holidays.

Escalations of service affecting issues during normal business hours are followed below:

Level	Escalation Procedure during business hours	Point of Contact (POC)	Phone Number
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Level	Escalation Procedure during business hours	Point of Contact (POC)	Phone Number
1	CapTel Customer Service	Customer Service Agent	(888) 269-7477 CapTel@CapTelmail.com
2	CapTel Customer Service Supervisor	Pam Holmes	(888)-269-7477 Pam.Holmes@CapTelmail.com
3	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	(877) 437-4660 Pam.Frazier@CapTelmail.com

Table 4 – *CapTel* Customer Service Escalation Procedures

Hours outside the normal business day are 5:00 PM to 8:00 AM Central Time for every day of the week (Monday through Friday), and all day Saturday, Sunday, and holidays. Outside of normal business day hours, a recording will play and trouble calls can leave a message for customer service to follow up during the next business day.

The recording heard by customers calling outside of *CapTel* customer service business hours is as follows:

Thank you for calling *CapTel* customer service. Our hours are Monday through Friday
from 8AM to 5PM central time. You may try again during business hours or leave a
voice mail message by pressing 3 now.

If the “3” button is pressed, then the customer will hear the following message:

Thank you for calling *CapTel* customer service. We are unable to take your call at this time. Please leave a detailed message with your name and phone number with area code, or email address, and a reason for your call, and one of our representatives will return your call as soon as possible.

Alternative usage for CapTel phone during outage for VCO users.

CapTel phones are equipped with the capability to connect to traditional relay services even in the event that the captioning service is not available.

In the event that a user cannot reach the captioning center, and the user desires to use any form of available relay to connect their call, the user can dial 711 (user must dial only 711 and not a relay 800 number in order to change to VCO mode) and be connected to the in-state relay call center. The user’s call will be processed via VCO instead of captions. In VCO mode, no audio from the called party will be processed – just like any other traditional VCO call.

Appendix H: Sprint TRS Standard Features Matrix

Mandatory Features	Description/Benefits	Cost
Answering Machine Retrieval	This feature allows Relay callers to retrieve their answering machine or voice-mail messages through the CA (Relay Agent, Relay Operator, Communication Assistant), referred to in this document as "CA".	No Additional Cost
ASCII Split Screen	The feature enables an ASCII user to communicate with the Relay in full duplex mode. Similar to voice-to-voice conversation, it provides interrupt capability as appropriate for the ASCII user and the voice party.	No Additional Cost
Automated Number Identification (ANI) Technology	ANI is the telephone number of the line initiating a call. The number is identified by the switch and passed over the network to the CA workstation.	No Additional Cost
CA Typing Speed	Text transmission of 60 wpm.	No Additional Cost
CA 10-minute In-call replacement	CAs are required to stay with a TRS call for a minimum of 10 minutes and with a STS call for minimum of 15 minutes.	No Additional Cost
Caller ID	Caller ID featuring SS7 technology is used to deliver the ten digit phone number of the calling party, when not blocked through the LEC for local and toll calls.	No Additional Cost
Call Response Time	Call response time is measured from the time it takes the call to hit the CA position from the Relay Center call controller switch. Sprint will adhere to the State's requirements regarding answer time.	No Additional Cost
Background Noises	During the call, TTY callers will be informed of background noises through CA's tying in parenthesis.	No Additional Cost
Beepers and Pagers	Sprint provides functionally equivalent pager calls, which are made to beepers and pagers, interactively and non-interactively. Calls are relayed between interactive paging services and the Relay users. For non-interactive paging services, calls are made to leave specific numeric information to accomplish those calls.	No Additional Cost
Branding of Call Type - Temporary	This feature refers to the system's ability to answer an incoming call based on the previous call in the caller's communication mode (TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind).	No Additional Cost
Branding of Call Type – Permanent	This feature refers to the system's ability to brand the caller's preferred communication mode – TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind – permanently.	No Additional Cost
Carrier-of-Choice	This feature allows Relay callers to choose their preferred Carrier for interstate/international and in some cases intra-island calls.	No Additional Cost
Cellular/PCS Phone Access	Allows Relay Cellular customers to reach the Relay 800 number(s) to complete Relay calls.	No Additional Cost
Custom Calling Services	Through the Customer Database feature, this feature allows Relay callers to have traditional LEC services i.e. frequently called numbers.	No Additional Cost
Customer Database	Allows Relay callers to enter specific information in a profile i.e. Carrier-of-Choice, emergency numbers, last number redial, customer notes, frequently dialed numbers, etc. to expedite their call set-up time.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Name and Address	This information could save valuable time when calling emergency services.	No Additional Cost
Long Distance profile	Callers' preferred Carrier for in-State and out-of-state long distance calls. Callers can also indicate their preferred billing option when placing long distance calls.	No Additional Cost
Frequently Dialed Numbers	This feature allows users to set up and access "speed dial" calls through the Relay.	No Additional Cost
Outdial Information	This feature allows the CA to be aware as to how the caller answers the phone and which language type they will communicate in.	No Additional Cost
Customer Notes	This feature informs the CA of special requests to handle calls i.e. "do not announce the service", preferred CA gender, etc.	No Additional Cost
Outdial Restrictions	Callers may restrict the type of call i.e. long distance, international, 900, etc. to be placed through the Relay.	No Additional Cost
Emergency Numbers	Callers may enter emergency numbers such as fire, doctor, police, etc. to expedite the emergency call processing.	No Additional Cost
Customized 800 Access	Each State has dedicated Relay 800 numbers to access the Relay service.	No Additional Cost
Deaf-Blind Pacing (Slow-typing)	This feature provides functionality that automatically slows the transmission of data to Deaf-Blind users. The default speed is 15 wpm and the speed can be increased at the caller's request in 5-wpm increments.	No Additional Cost
Delayed Call Announcer	Sprint sends a delayed call announcer when the call is not answered within 30 seconds. The feature alerts Relay callers that they are on-line and on hold for next available CA.	No Additional Cost
Dialed Number Verification	This feature echoes the number being outdialed and the call type in the TTY Dial string macro. This feature helps TTY callers know if a number has been misdialled and the type of call they are placing.	No Additional Cost
Directory Assistance (Intrastate/Interstate)	This feature allows Relay callers to reach Directory Assistance at rates no greater than that of traditional voice users. When the number is obtained, the caller may choose to place the call through the Relay or dial direct.	No Additional Cost
Emergency Assistance	This service provides emergency assistance for Relay callers through Sprint's E911 database and/or their Customer Database profile.	No Additional Cost
Enhanced Modems	Sprint's TRS modems support enhancements in ASCII communication protocols. The capabilities of Sprint's modems include auto detection; connections with modems up to 14.4k; and faster ASCII detection (3 seconds).	No Additional Cost
Error Correction	Sprint Relay workstations are equipped with the Error Correction capability to automatically correct common typographical errors and spell out abbreviations, while increasing typing speed and reducing conversational minutes.	No Additional Cost
Gender ID	This feature provides the gender of CAs in the TTY greeting macro.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Hearing-Carry-Over (HCO)	HCO allows speech-disabled or mute users with normal hearing to listen to the person they are calling. The HCO user types his/her conversation for the CA to read and voice to the standard (voice) telephone user.	No Additional Cost
HCO-HCO	HCO users can contact HCO users through the Relay. The CA will voice to both parties what is typed on each user's TTY.	No Additional Cost
HCO Permanent Branding	The permanent branding enables HCO callers to listen during call set-up. The HCO brand greeting macro is: [STATE]RELAY 1234F YOU MAY HEAR VOICE OR USE TTY GA	No Additional Cost
HCO-TTY	HCO users can contact TTY users through the Relay. HCO users can listen while the CA is reading/voicing the TTY user's typed message. The HCO user types their conversation directly to the TTY user.	No Additional Cost
Voice-Carry-Over (VCO)	VCO allows Deaf or Hard-of-Hearing people who prefer to use their own voice to speak directly to the party they are calling. The CA types the voiced responses back to the VCO user who can read the typed messages across the TTY screen.	No Additional Cost
Two-line VCO	This feature allows VCO callers with two telephone lines to use one line to speak directly to the hearing person while the other line is used to receive the CA's typed responses simultaneously. Two-Line VCO offers a more natural flow of conversation without pauses required with single line calls.	No Additional Cost
Reverse 2-Line VCO	This feature is similar to Two-line VCO. In R2LVCO, a VCO user receives a call from a voice user first then dials/connects the Relay CA.	No Additional Cost
VCO-HCO	VCO users can contact HCO users through the Relay. The VCO user speaks directly to the HCO user and the HCO user types their conversation directly to the VCO user.	No Additional Cost
VCO-VCO	VCO users can contact other VCO users through the Relay. The CA listens to VCO users speak and type the spoken words for the parties at both ends.	No Additional Cost
VCO-TTY	VCO users can contact TTY users through the Relay. The VCO user can use his/her own voice and the CA will listen to the VCO caller's spoken words then type the message to the TTY user. The TTY user types directly to VCO user without any CA interaction.	No Additional Cost
VCO w/ Privacy/NO GA	This is similar to the standard VCO feature however; the CA will not hear the VCO caller speaking through the Relay. The CA will only type voiced responses back to the VCO user.	No Additional Cost
VCO Permanent Branding	This feature enables VCO callers to set-up the call without typing. The permanent VCO brand greeting macro would be: [STATE]RELAY 1234F VOICE (OR TYPE) NOW GA	No Additional Cost
Inbound International	From any international destinations outside of United States, callers can reach the Relay through Sprint's international inbound 10-digit number- 605-224-1837.	No Additional Cost
Intelligent Call Router	Dynamic Call Routing technology automatically and seamlessly routes Relay calls to the first available English or Spanish CA in the network.	No Additional Cost
Intercept Message	This feature provides intercept messages in voice and TTY in event of system failure occurrence within the Relay switch, Center, or outbound circuits.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Last Number Redial	Relay users can request the CA to redial their last number. Sprint TRS is designed to store the user's last number dialed and it is dialed upon the user's command, "LAST NUMBER REDIAL PLS GA" OR "LNR GA".	No Additional Cost
Local/Extended Area Service	Callers who subscribe to extended area service plans will receive equivalent service through the Relay.	No Additional Cost
Machine Recording Capabilities	This feature reduces redials when CAs receive audio-text interaction machines. In most cases, it allows the callers to receive all of the information on the first call and eliminates the number of redials.	No Additional Cost
Restricted 800/888/877/866/855	This feature allows Relay callers to reach regionally restricted or regionally directed 800/888/877/866/855 toll-free numbers.	No Additional Cost
Spanish-to-Spanish	Sprint offers Spanish Services, which offers Spanish-to-Spanish Relay service, which are handled by proficient bilingual (Spanish) CAs. Their workstations are modified to provide macros and other functions to the caller in Spanish.	No Additional Cost
Speech Disabled Indicator	The command "S" typed by a Speech-Disabled person would inform the CA that a Speech-Disabled person is on the line.	No Additional Cost
Speech-to-Speech	This service enables Speech-Disabled customers to use their voice, with assistance from CA if necessary, to communicate with each other through the Relay.	No Additional Cost
Text/Voice Transmission	This feature offers the ability to toggle between inbound TTY, ASCII, TurboCode™, and Voice calls.	No Additional Cost
Toll Discounts	When calls are carried over the Sprint network, intrastate calls are typically discounted by 35% Day, 25% Evening, and 10% Night/ Weekend off intrastate MTS rates and interstate calls are discounted by 50% off interstate MTS rate. State specific requirements may result in a change to the standard discounts.	No Additional Cost
Transfer Gate capabilities	Sprint's system has the capability of transferring Relay callers to English TTY Operator Service and Relay 24-hour Customer Service.	No Additional Cost
TRS Customer Service	Relay users can reach Sprint's TRS Customer Service, which is available 24 hours-a-day, 7 days-a-week to request information, or to offer commendations and submit complaints. The toll-free number is: 1-800-676-3777 TTY/Voice/ASCII/Spanish.	No Additional Cost
TTY Operator Services (OSD)	Sprint's TTY Operator services can complete TTY-to-TTY calls; obtain Directory Assistance information; or receive credit for erroneous billing. The toll-free number is: 1-800-855-4000.	No Additional Cost
TurboCode™	This feature allows enhanced baudot transmission speed up to 110 words-per-minute. It enables TTY callers with TurboCode™ capability to interrupt during the transmission of the call.	No Additional Cost
Variable Time Stamp Macro	This feature (macro) enables Relay callers to know when their called party had disconnected and relays the last spoken words.	No Additional Cost
Voice Call progression	This system upgrade allows Voice or HCO callers to listen during call set-up i.e. ringing, busy.	No Additional Cost
Voice Gender ID	This feature (macro) informs the outbound TTY caller the gender of their caller.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Pay-Per-Call	Sprint provides access to Pay-Per-Call Services (900) via a toll-free 900 number which observes LEC restrictions so that customers do not have to register blocks with the Relay.	No Additional Cost
7-1-1	With cooperation of Local Exchange Companies, the Relay can accept 711 calls.	No Additional Cost

Appendix I: Policy on 10- and 15-Minute Rule

Sprint understands that a change of CAs can interrupt the natural call flow. Therefore, Sprint strives to keep the same CA dedicated to each call. Sprint will ensure that the CA remains on the call for at least 10 minutes (or 15 minutes for a Speech-to-Speech call). If a change of CA is unavoidable, CAs are trained to make this transition as smoothly as possible and will inform both parties.

A CA change may occur for the following reasons:

- Customer requests change of CA
- End user verbal abuse of CA or obscenity towards CA
- The call requires a specialist (Speech to Speech, another language)
- Illness
- Potential conflict of interest (e.g., the CA identifies an end user as a family member or friend)

In instances where it is necessary to change CAs, a second CA will plug in his/her headset at the position and watch the call for several minutes in order to assess the “spirit” of the call and make the transition smoother. After several minutes of observation, the second CA will wait until the voice person stops speaking and all conversation has been relayed and will then type to the TTY user:

(CA# CONTINUING UR CALL).

The CA will say to the non-TTY user:

“THIS IS CA # CONTINUING YOUR CALL.”

During initial training, trainees are required to practice this procedure. In addition, a training video was developed that clearly shows the procedure and how to ensure it is as smooth as possible.

Appendix J: FCC TRS Mandatory Minimum Standards & Compliance Matrix

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
Provision of Services		
§ 64.603	<p>Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p> <p>Speech-to-speech relay service shall be provided by March 1, 2001.</p> <p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p> <p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p>Sprint has been a TRS provider since September 1, 1990. As of July 1, 2004, Sprint provides TRS to 32 States, the Federal Government, Common wealth of Puerto Rico, and three resellers.</p> <p>Sprint was the first TRS provider to offer Speech-to-speech relay service (California, 1996).</p> <p>Sprint was the first TRS provider to offer intrastate and interstate Spanish services (Texas, 1991). As a standard offering of TRS, Sprint provides Spanish services to the States. Sprint also is the only TRS provider to offer Spanish-speaking Customer Service.</p> <p>Sprint fully implemented 711 accesses for all of its States on October 1, 2001. Sprint Local and wireless divisions have implemented 711 access on September 15, 2001.</p>
Operational Standards		
§ 64.604 A.1	<p>Communications Assistant (CA) Competency Skills</p> <p>CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.</p> <p>CAs must be competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.</p> <p>Typing Speed - 60 WPM with technological aids</p> <p>Oral-to-type tests</p>	<p>Sprint requires that all CAs have a high school graduate equivalency as a minimum qualification for the job.</p> <p>All CAs are tested and evaluated to ensure Relay skills meet the following FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures and ASL translation.</p> <p>Each Sprint CA is required to take the 60 WPM typing test quarterly (four times a year).</p> <p>Sprint administers Oral-to-type tests.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	VRS 'qualified' Interpreters	Sprint VRS interpreters are qualified interpreters that adhere to RID Code of Ethics.
§ 64.604 A.2	<p>Confidentiality & Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content</p> <p>Certain exceptions are provided for Speech-to-Speech calls.</p> <p>CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise</p>	<p>CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p>Sprint CAs are prohibited from disclosing any call content.</p> <p>STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls.</p> <p>CAs relay calls verbatim and do not alter relayed conversation.</p> <p>During the annual merit reviews, each CA reviews the confidentiality and code of ethics with his/her team supervisor.</p>
§ 64.604 A.3	<p>Types of Calls</p> <p>CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p> <p>TRS shall be capable of handling any type of call normally provided by common carriers.</p>	<p>CAs process all calls and never prohibit sequential calls or limit length of calls.</p> <p>Sprint TRS is capable of handling all call types normally provided by common carriers</p>
§ 64.604 A.4	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Via E911 database, Sprint automatically and immediately connects the caller to an appropriate PSAP.</p> <p>CAs pass along the caller's number to the PSAP when the caller disconnects prior to be connected to the emergency service.</p>
§ 64.604 A.5	<p>In-call Replacement of CAs</p> <p>CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10</p>	<p>TRS and VRS CAs stay on the call for a minimum of 10 minutes.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	minutes. STS CAs - 15 minutes.	STS CAs stay on the call for a minimum of 15 minutes.
§ 64.604 A.6	CA Gender Preferences TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.	Sprint users are able to request the gender of the CA. Sprint makes every effort to satisfy this request and to maintain the same gender during transfers.
§ 64.604 A.7	STS Called Numbers STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user. This information must be transferred to any new provider.	Sprint offers STS users the option of maintaining a list of names and phone numbers. When the STS user requests a name, the STS CA will repeat the name and the number to user. Sprint will provide the STS user information to any new provider.
Technical Standards		
§ 64.604 B.1	ASCII & Baudot TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	Sprint TRS communicates with Baudot and ASCII in all speeds that are generally in use. The following Baudot codes are available on Sprint TRS' platform: Baudot 45.5, Baudot 50, Turbo Code, and E Turbo Code.
§ 64.604 B.2	Speed of Answer TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. Abandoned calls shall be included in the speed-of-answer calculation. Speed of Answer is to be measured on a daily basis. The system shall be designed to a P.01 standard.	Sprint ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of-answer calculation. Speed of Answer is measured on a daily basis. Sprint's system is designed to the P.01 standards.

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
§ 64.604 B.3	<p>Equal Access to IXCs</p> <p>TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.</p>	<p>Sprint provides users with access to their IXC carrier through the Sprint Carrier of Choice program allowing for the same access that is provided to voice users.</p>
§ 64.604 B.4	<p>TRS Facilities</p> <p>TRS shall operate everyday, 24 hours a day.</p> <p>TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.</p> <p>Adequate network facilities shall be used in conjunction with TRS.</p>	<p>Sprint TRS is available 24 hours a day, everyday.</p> <p>Sprint has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.</p> <p>Sprint's network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.</p>
§ 64.604 B.5	<p>Technology</p> <p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p>VCO & HCO technology are required to be standard features of TRS.</p>	<p>Sprint is the nation's leader in the development and offering of technological features for TRS. Sprint has introduced over fifty key product enhancements including Split Screen ASCII, Customer Database, Turbo Code, E Turbo Code/Dial Through, Gated VCO, Voice call progression.</p> <p>Sprint provides VCO and HCO technology as standard features as well as several variations on these technologies.</p>
§ 64.604 B.6	<p>Voicemail & Interactive Menus</p> <p>CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.</p> <p>TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete</p>	<p>CAs keep the user informed and notify of the presence of recorded messages and interactive menus. CA positions have hot key functionality that electronically capture recorded messages and retain them for the length of the call.</p> <p>Sprint does not charge for any additional calls necessary to complete call involving recorded</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	calls involving recorded or interactive messages. TRS will handle pay-per-calls.	or interactive menus. Sprint was the first provider to process pay-per-calls (Texas, 1996).
Functional Standards		
§ 64.604 C.1	<p>Consumer Complaint Logs</p> <p>States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.</p> <p>States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.</p>	<p>Sprint maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.</p> <p>Sprint has submitted annual summary of Consumer Complaints log report:</p> <p>June 1, 2002-May 31, 2003 June 1, 2003-May 31, 2004 June 1, 2004-May 31, 2005 June 1, 2005-May 31, 2006 June 1, 2006-May 31, 2007</p>
§ 64.604 C.2	<p>Contact Persons</p> <p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	<p>Sprint provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.</p>
§ 64.604 C.3	<p>Public Access to Info</p> <p>Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.</p>	<p>Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	<p>TRS.</p> <p>Sprint regularly provides 711 dialing information in its education and outreach programs.</p>
§ 64.604 C.4	<p>Rates</p> <p>TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.</p>	<p>Sprint TRS users pay rates no greater than the rates paid for functionally equivalent voice communication services.</p>
§ 64.604 C.5	<p>Jurisdictional Separation of Costs</p> <p>(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations</p> <p>(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism</p> <p>(iii) Telecommunications Relay Services Fund - To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate TRS is recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism.</p> <p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p>
§ 64.604 C.6	<p>Complaints</p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>	<p>The Sprint TRS Customer Contact process is fully compliant with all FCC Requirements.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
§ 64.604 C.7	Treatment of TRS Customer Info Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.	Sprint transfers TRS customer profile data to incoming TRS vendors. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees.
§ 64.605	State Certification Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.
Availability of SS7 Technology to TRS Facilities Transmittal of Calling Party Information	Concluded that TRS providers should have access to SS7 or similar technology to make Caller ID and other benefits available and facilitate provision of TRS. (§16) Concluded that TRS providers are required to observe FCC's rules pertaining to Caller ID and call blocking services. (§22) Concluded that when a TRS facility is able to transmit any identifying information to the network, the TRS facility must pass through, to the called party, the number of TRS facility, 711, or, if possible, the 10-digit number of the calling party. The identifying information passed through the TRS facility to the called party is to be determined by the TRS Provider. (§25)	Sprint's SS7 platform supports Caller ID services. Sprint complies with all FCC rules pertaining Caller ID and call blocking services. Sprint's SS7 platform transmits the 10-digit number for local and toll calls. Sprint's SS7 platform also will recognize the ID blocking indicators.
Types of Calls	Concluded that the following call types are adopted as mandatory minimum standards of TRS. Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY	Sprint has provided the VCO and HCO calling combinations since 1996.

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>VCO-to-VCO</p> <p>This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007. (§36)</p>	
Handling of Emergency Calls	<p>Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). (§42)</p> <p>This requirement has been waived for Internet Relay and Video Relay Services. (under separate Orders for SRO and VRS)</p>	Sprint immediately connects emergency callers to an "appropriate" PSAP as defined by the FCC.
Answering Machine Message Retrieval	<p>This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party.</p> <p>Concluded that the answering machine retrieval to be provided on interstate and intrastate basis by 8/24/03. (§62)</p>	Sprint has provided the Answering Machine Retrieval since 1996.
Call Release	<p>Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the relay the conversation.</p> <p>Ruled that once the CA signs off, or be "released," after the two TTY parties are connected, at this point, the call ceases to be a TRS call subject to the per-minute reimbursement." (§68)</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (§76)</p>	<p>Sprint has provided the Call Release feature since 2003.</p> <p>Once a call is "released" from the CA workstation, the call is no longer a relay call and accordingly will not be charged to the state customer.</p>
Speed Dialing	<p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (§76)</p>	Sprint has provided Speed Dialing or Frequent Dialed Numbers feature since September 1, 1996.

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
Three-way Calling	<p>Three-way calling feature is generally arranged in one of two ways. (§73)</p> <p>1. The TRS consumer may request that the CA set up the call with two other parties</p> <p>or;</p> <p>2. The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (§76)</p>	<p>Sprint has supported three-way calling capabilities, from the customer's premises, since September 1, 1995.</p>

Appendix K: FCC CapTel Mandatory Minimum Standards & Compliance Matrix

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Provision of Services			
§ 64.603	<p>Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p> <p>Speech-to-speech relay service shall be provided by March 1, 2001.</p> <p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p> <p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p>The Communications Act defines TRS as "telephone transmission services that provide the ability for an individual who has hearing or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio." Since TRS calls handled via captioned telephone VCO service fall squarely within this definition - i.e. they allow communications between persons with hearing or speech disabilities and persons without such disabilities - we conclude that captioned telephone VCO service falls within statutory definition of TRS. (§7)</p>	<p>Sprint has been a <i>CapTel</i> provider, on trial basis, since May 1, 2002. On January 1, 2004, Sprint successfully converted <i>CapTel</i> trial into a FCC-complaint <i>CapTel</i> service, first -ever in the TRS Industry.</p> <p>Speech-to-speech relay service for <i>CapTel</i> is waived by FCC. See Section 64.604 A.3.</p> <p>Sprint is also the first <i>CapTel</i> provider to offer intrastate and interstate Spanish services on January 1, 2004.</p> <p>Sprint is able to process inbound 711 calls to include access to <i>CapTel</i> services.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Operational Standards			
§ 64.604 A.1	<p>Communications Assistant (CA) Competency Skills</p> <p>CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.</p> <p>CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.</p> <p>Typing Speed - 60 WPM with technological aids</p> <p>Oral-to-type tests</p>	<p>Requirement applies.</p> <p>Use of <i>CapTel</i>'s voice recognition software "is a permissible means ...for achieving the CA's competency skills required by the TRS mandatory minimum standards" (§39).</p> <p>Waived. Interpreting typed ASL is not applicable.</p> <p>Use of voice recognition technology in the provision of <i>CapTel</i> VCO service "is a permissible means for ... enhancing transmission speed..." (§39)</p> <p>Waived. Permits use of Oral-to-text tests instead.</p>	<p>Sprint requires that all <i>CapTel</i> CAs have a high school graduate equivalency as a minimum qualification for the job.</p> <p>All <i>CapTel</i> CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. <i>CapTel</i> CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures.</p> <p>A captioned telephone user does not type in making a call, therefore is never the opportunity for the CA to have to interpret typewritten ASL</p> <p><i>CapTel</i>'s voice recognition technology transmits above 100 WPM.</p> <p>Oral to text tests are given to all <i>CapTel</i> CAs</p>
§ 64.604 A.2	<p>Confidentiality & Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content.</p> <p>CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p><i>CapTel</i> CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p><i>CapTel</i> CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 A.3</p>	<p>Types of Calls</p> <p>CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p> <p>TRS shall be capable of handling any type of call normally provided by common carriers and can decline calls if credit card authorization is denied.</p>	<p>Waived for outbound calls (§ 46) because the <i>CapTel</i> CA is not involved in call set up and cannot refuse the call (§46)</p> <p>Not waived for inbound calls to a <i>CapTel</i> user made through a TRS facility. However, if call is made directly to the captioned telephone access number no set up is involved and the <i>CapTel</i> CA cannot refuse to call (§46).</p> <p>Requirement applies.</p> <p>Note: The requirement to provide 711 dialing is waived for outbound calls made from a <i>CapTel</i> phone. Inbound 711 calling waived for one year (8/1/03 - 7/31/04).</p> <p>Also STS and HCO are waived (§29).</p>	<p><i>CapTel</i> users dial sequential calls directly therefore there is no way for a <i>CapTel</i> CA to refuse sequential calls or limit length of calls.</p> <p><i>CapTel</i> will not refuse single or sequential inbound calls or limit the length of calls utilizing the service. If an inbound call is made to a captioned telephone user via the captioned telephone access number, set-up is automatic, and thus there is no way for a CA to refuse the call.</p> <p><i>CapTel</i> is capable of handling all call types normally provided by common carriers.</p>
<p>§ 64.604 A.4</p>	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p><i>CapTel</i> user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.</p> <p>The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the <i>CapTel</i> user back.</p>

FCC 03-112 Appendix D Final Rules		FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 A.5	<p>In-call Replacement of CAs</p> <p>CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.</p>	Requirement applies.	<i>CapTel</i> CAs stay on all calls for a minimum of 10 minutes.
§ 64.604 A.6	<p>CA Gender Preferences</p> <p>TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.</p>	Waived. (§ 36, 47-48).	
§ 64.604 A.7	<p>STS Called Numbers</p> <p>STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user.</p> <p>This information must be transferred to any new provider.</p>	Waived. (§29)	
Technical Standards			
§ 64.604 B.1	<p>ASCII & Baudot</p> <p>TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.</p>	Waived. (§53-54)	

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.2</p>	<p>Speed of Answer</p> <p>TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.</p> <p>Abandoned calls shall be included in the speed-of-answer calculation.</p> <p>Speed of Answer is to be measured on a daily basis.</p> <p>The system shall be designed to a P.01 standard.</p>	<p>Requirement applies</p> <p>Requirement applies.</p> <p>Requirement applies.</p>	<p>Sprint <i>CapTel</i> ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.</p> <p>Abandoned calls are included in the speed-of-answer calculation.</p> <p>Sprint <i>CapTel</i> system is designed to a P.01 standard or greater measured on a daily basis.</p>
<p>§ 64.604 B.3</p>	<p>Equal Access to IXCs</p> <p>TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.</p>	<p>Requirement applies.</p>	<p><i>CapTel</i> users will be able to choose their IXC carrier through the <i>CapTel</i> Carrier of Choice program allowing for the same access that is provided to voice users.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.4</p>	<p>TRS Facilities</p> <p>TRS shall operate everyday, 24 hours a day.</p> <p>TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.</p> <p>Adequate network facilities shall be used in conjunction with TRS.</p>	<p>FCC noted that <i>CapTel</i> is not a mandated service but stated that <i>CapTel</i> is a form of enhanced VCO service. It allowed interstate reimbursement from the Interstate TRS Fund. For a provider to be eligible for reimbursement from the Interstate TRS Fund for the provision of TRS, the provider must either meet the mandatory minimum standards or request and receive waivers of the standards. (§ 22, 24)</p> <p>State TRS programs, of course, are free to offer this service and to reimburse providers of intrastate captioned telephone VCO service. (§ 22).</p>	<p>Sprint <i>CapTel</i> is available 24 hours a day, everyday.</p> <p>Sprint <i>CapTel</i> has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.</p> <p>Sprint <i>CapTel</i> network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.</p>
<p>§ 64.604 B.5</p>	<p>Technology</p> <p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p>VCO & HCO technology are required to be standard features of TRS.</p>	<p>FCC acknowledged that <i>CapTel</i> is an enhanced VCO service of TRS (§ 44).</p> <p>Waived for HCO. (§ 29)</p>	<p>Sprint is the nation's leader in the development and offering of technological features for TRS.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.6</p>	<p>Voicemail & Interactive Menus</p> <p>CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.</p> <p>TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.</p> <p>TRS will handle pay-per-calls.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p><i>CapTel</i> user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The <i>CapTel</i> user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.</p> <p><i>CapTel</i> users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The <i>CapTel</i> user interacts with the recorded message system directly. This is treated as one call.</p> <p>Sprint <i>CapTel</i> supports pay-per-call call types.</p>
Functional Standards			

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p><u>§ 64.604 C.1</u></p>	<p>Consumer Complaint Logs</p> <p>States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.</p> <p>States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.</p>	<p>Requirement applies.</p>	<p>Sprint <i>CapTel</i> maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint <i>CapTel</i> provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.</p>
<p><u>§ 64.604 C.2</u></p>	<p>Contact Persons</p> <p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	<p>Requirement applies.</p>	<p>Sprint <i>CapTel</i> provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.</p>
<p><u>§ 64.604 C.3</u></p>	<p>Public Access to Info</p> <p>Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.</p> <p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	<p>Requirement applies.</p>	<p>Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 C.4</p>	<p>Rates</p> <p>TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.</p>	<p>Requirement applies.</p>	<p><i>CapTel</i> users pay rates no greater than the rates paid for functionally equivalent voice communication services.</p>
<p>§ 64.604 C.5</p>	<p>Jurisdictional Separation of Costs</p> <p>(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations</p> <p>(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism</p> <p>(iii) Telecommunications Relay Services Fund - To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	<p>Requirement applies.</p>	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate <i>CapTel</i> is recovered from all subscribers of interstate services</p> <p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<u>§ 64.604 C.6</u>	<p>Complaints</p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>	Requirement applies.	The Sprint <i>CapTel</i> Customer Contact process is fully compliant with all FCC Requirements.
<u>§ 64.604 C.7</u>	<p>Treatment of TRS Customer Info</p> <p>Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.</p>	Requirement applies.	Sprint transfers <i>CapTel</i> customer data to incoming <i>CapTel</i> vendors. Customer information that is normally contained in a TRS profile is not required for <i>CapTel</i> as the CA is anonymous to the call and the <i>CapTel</i> user talks directly to the called party. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees unless Sprint is compelled by legal process to provide such information.
<u>§ 64.605</u>	<p>State Certification</p> <p>Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.</p>	Requirement applies.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.

FCC 03-112 Appendix D Final Rules		FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Availability of SS7 Technology to TRS Facilities	Concluded that if a TRS provider is able to transmit any calling party identifying information to the network, it must provide Caller ID service.	Requirement applies.	Sprint <i>CapTel</i> will have the capability to transmit the 10-digit number and will recognize the ID blocking indicators. Sprint <i>CapTel</i> will deliver the SS7 technology on February 1, 2004.	
Types of Calls	Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY VCO-to-VCO	Minimum standards pertaining to HCO are waived. VCO requirements still apply.	Sprint <i>CapTel</i> supports the VCO calling combinations.	
Handling of Emergency Calls	Concluded that TRS providers must use a system for incoming emergency TRS calls that at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point.	Requirement applies.	<i>CapTel</i> user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.	
Answering Machine Retrieval	Concluded that the answering machine and voice mail retrieval are TRS features that must be provided to TRS users. Answering machine retrieval through TRS is accomplished when the recipient of the message, the TRS user, calls the TRS facility and has the CA listen to the voice messages.	The requirement was not addressed in the Declaratory Ruling.	Answering machine and voicemail retrieval is provided by <i>CapTel</i> . Answering machine retrieval through <i>CapTel</i> is accomplished when the <i>CapTel</i> facility caption the voice message to the <i>CapTel</i> users.	

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Call Release	<p>Concluded that call release is required under FCC's functional equivalency mandate.</p> <p>Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the conversation. The feature allows CA to sign-off or be "released" from the telephone line without, triggering a disconnection between two TTY users, after the CA connects the originating TTY caller to the called party's TTY through e.g. a business switchboard.</p>	Waived. (§ 52)	
Speed Dialing	<p>Concluded that speed dialing feature is required under FCC's equivalency mandate.</p> <p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p>	The requirement was not addressed in the Declaratory ruling.	<i>CapTel</i> telephones have the Speed Dial feature.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Three-way Calling	<p>Concluded that three-way calling is required under FCC's functional equivalency mandate but did not specifically mandate the way such functionality had to provide.</p> <p>The FCC's Order imposing such requirement stated that "generally" three-way calling can be provided "in one of two ways " One way is for the TRS consumer to request that the CA set up the call with two other parties.</p> <p>The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p>	The requirement was not addressed in the Declaratory Ruling.	<p>Sprint <i>CapTel</i> users will be able to participate a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing telephone switch hook (or "flash") button on his or her CPE. Thus, Sprint <i>CapTel</i> meets the requirement for three-way calling. (For One-Line <i>CapTel</i>.) For Two-Line <i>CapTel</i> either party can initiate a 3 way call should the user purchased this as a LEC option.</p> <p>Sprint <i>CapTel</i> users will be able to participate in a conference bridge to speak to three or more individuals.</p>

Appendix L: Sprint's Report to the FCC on VRS and IP Waivers

FCC Internet and Video Relay Service Annual Progress Report April 16, 2007

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
1. STS	Waived through 1/1/08	STS is not possible over the internet. Voice over IP (VoIP) **REQUIRES** Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived Indefinitely; No report required	NA	NA
2. Spanish Relay	NA	NA	NA	Compensable but non-mandated service.	NA	Sprint provides ASL to Spanish Video Relay Service.
3. Types of Calls	NA	NA	NA	Waived through 1/1/08	Voice over IP (VoIP) requires Quality of Service. QoS means that all the associated	We are currently providing two-line VCO and HCO controlled at

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					<p>data packets arrive in one contiguous stream and in order.</p> <p>In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.</p> <p>Sprint offers alternatives VCO and HCO solution by using second line (analog line) where the Video Interpreter asks for a second number to call back using three-way call feature. The procedure is similar to two-line VCO or HCO call.</p>	the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO and HCO began in 2005. This is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
4. Emergency Call Handling	Waived through 1/1/08	Internet Protocol network (IP network) does not support the Automated	Sprint implemented a "manual" (directory assistance	Waived through 1/1/07	Internet Protocol network (IP network) does not support the Automated	No additional information to submit beyond our recent

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
		Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	lookup) process for 911 calls through Internet Relay. The technical challenge remains of tying an exact location to an IP address. No additional development has been made that would allow Internet Relay users to place 911 calls through Internet Relay.		Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	submission to the FCC. Current options may restrict interoperability. An Emergency database is still in use today for subscribers who choose to register a profile; however, agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates.
5. Speed of Answer	NA	NA	NA	1/1/07- 80% of all calls within 120 seconds (monthly).	Sprint is exceeding the 80/120 service level requirement that went into effect January 1, 2007.	Sprint will continue to meet the requirement measured on a monthly basis.
6. Equal Access to Interexchange Carrier	Waived Indefinitely; No report required	NA	NA	Waived through 1/1/08	The IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and without an ANI to charge back for toll calls, Sprint cannot support equal access to interexchange	The technical challenge remains of tying an exact location to an IP address for VRS users. However, the very nature of the internet makes billing for toll calls obsolete.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					carrier features for Video Relay Service.	
7. Pay-per-call (900) Service	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Video Relay end users to be billed for pay-per-call services.
8. Voice Carry Over (VCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line VCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						end user equipment.
9. Hearing Carry Over (HCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line HCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
10. VCO – to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			baudot protocols are not compatible.			because. the videoconferencing via internet or ISDN protocols are not compatible.
11. HCO – t o- TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
12. VCO – to – VCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and baudot protocols are not	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			compatible.			ISDN protocols are not compatible.
13. HCO – to – HCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
14. Call Release	Waived through 1/1/08	An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible.	It is not technically feasible at this time to provide call release features with Internet Relay calls. However, Sprint will continue to investigate new developments to allow Internet Relay customers to use this feature.	Waived through 1/1/08	A VRS customer utilizes a video connection to make an inbound call. The VRS operator utilizes a voice channel (SS7) to make an outbound dial. Because the two types of calls are not compatible, the call release feature is not technically feasible. Also, in the VRS environment, we are currently unable to remove the Video Interpreter	It is not technically feasible at this time to provide call release features with Video Relay calls. However, Sprint will continue to investigate new developments to allow Video Relay customers to use this feature.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					agent from the middle of the call when the inbound video caller reaches an outbound customer who also has video capability.	
15. 3-way Calling	Waived through 1/1/08	The current Internet Relay call environment does not support the capability to perform three-way calling initiated call from agent via Sprint IP.	It is possible for the customer to initiate a three-way call if he/she has conference calling capability. In this case, the operator does not needed to perform the three-way calling function. However, the limitation is that Sprint's Internet Relay Service will handle only one TTY user (and unlimited number of voice users) when using three-way calling via relay service. It is possible to have 2-Line VCO via Sprint IP using user-initiated three-way calling.	Waived through 1/1/08	At this time, it is not technically feasible to provide a 3-way Video Relay call. Customers using VRS do not have the web-enabled ability to initiate 3-way video calls because of the limitations of end user equipment. Features of customer premise equipment are not under the control of the VRS provider, and therefore the VRS provider cannot control the establishment of a three-way call.	The voice customer is currently able to use the LEC-provided three-way calling feature. One or two of the three legs of the call can be engaged as they would without VRS being a part of the call. VRS is transparent to this process. The VRS agent who receives an inbound video connection has the ability to out dial to multiple voice parties to create a three-way call of which two parts are voice and one part is video. The VRS agent platform is however, unable to support a three way call

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						between two video customers and one voice user at this time.
16. Speed Dialing	Waived through 1/1/08	Sprint's current Speed Dial system is supported by ANI driven customer profile. Without being able to identify the customer's ANI, Sprint is not able to access the preferred speed dial list.	Customers can maintain their own speed dial list on their computer and paste the phone number on the web prior to the call. The phone number will be pre-populated to agent's dialing window for efficient call processing.	Waived through 1/1/08	This service is currently available for VRS customers who choose to use our webcam based product. They can create a speed dial list online and greatly improve the efficiency and connect time with the outbound party through the Video Interpreter. Individuals using TV-based videophones do not have this web enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.	Individuals using TV-based videophones do not have this web-enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
17. Providing Service 24/7	NA	NA	NA	NA	NA	NA

Appendix M: Sprint Relay Fact Sheet

Sprint Relay

www.sprintrelay.com

Sprint is the leading provider of relay services in the United States so that those who are deaf and hard of hearing can have anytime, anywhere communications. With 16 years of experience in providing Telecommunications Relay Services (TRS), Sprint is the relay service provider for 31 states plus the Commonwealth of Puerto Rico, New Zealand and the federal government. Sprint has been awarded the following state TRS contracts:

Alabama	Indiana	New Mexico	Texas
Alaska	Illinois	New York	Utah
Arkansas	Massachusetts	North Carolina	Vermont
California	Minnesota	North Dakota	Washington
Colorado	Mississippi	Ohio	
Connecticut	Missouri	Oklahoma	
Delaware	Nevada	Oregon	
Florida	New Hampshire	South Carolina	
Hawaii	New Jersey	South Dakota	

TRS enables standard voice telephone users to talk to people who are Deaf, Hard of Hearing or Speech-disabled on the telephone. Under Title IV of the Americans with Disabilities Act, all telephone companies must provide free relay services either directly or through state programs throughout the 50 states, the District of Columbia, Puerto Rico and all of the U.S. territories. Sprint Relay's experience in the field provides the assurance that all services delivered will meet or exceed Federal Communications Commission mandates for TRS.

Sprint Relay Services

Traditional relay services involve a relay operator serving as an intermediary for phone calls between a deaf, hard of hearing or speech-disabled user and a hearing party. The TRS operator speaks words typed by a deaf user on a text telephone (TTY) or via the Internet and relays the hearing person's spoken response by typing back to the deaf user.

Emerging Technology:

Under the Americans with Disabilities Act, all telephone companies are required to pay a percentage of the money that they collect from their subscribers into a national telecommunications relay services fund. This interstate fund is administered by NECA (National Exchange Carriers Association).

Currently, two technologies are funded through NECA – video and Internet relay services. There is strong competition in the TRS industry due to the fact that no state contract is required in any state to process calls through the Internet.

Video relay services (VRS) provides American Sign Language (ASL) users with an attractive alternative that offers them the opportunity to communicate by video conferencing using ASL, their native language, which may be preferred over the traditional TTY relay service. VRS requires users to have a personal computer or television monitor, a Web camera or videophone, and high-speed Internet connectivity such as cable or DSL. Sprint Video Relay, powered by CSD (Communication Services for the Deaf), is a free service through the Internet that enables the deaf or hard of hearing user to communicate in ASL to a hearing or standard telephone user. Sprint Relay and CSD launched the first nationwide Video Relay Service in May 2002. To connect with a video interpreter, visit www.sprintvrs.com.

Sprint IP Relay is also a free service that combines TRS with the ease and ubiquity of the Internet, allowing users to make calls from any PC or selected Web-enabled Internet wireless devices without having to use traditional TTY equipment. Sprint IP Relay users also have the flexibility of using AOL Instant Messenger to access Sprint IP Relay. To connect using a website, go to www.sprintip.com. To connect using AOL Instant Messenger, send a 10-digit number to the screen name **SprintIP**. Both access methods will connect the caller to an experienced Sprint Relay operator.

Sprint IP Wireless Relay is a new service that allows customers who are deaf, hard-of-hearing or who have a speech disability to use wireless relay services on a select number of wireless devices:

- 1) BlackBerry phones (with an operating system 4.0 or higher). Customers can use this service to communicate with any standard or mobile telephone user in the United States via a free downloadable application at www.sprintrelay.com/download/. Users simply select a contact from their address book or enter a phone number with accompanying text instructions to a Sprint IP Relay Operator.
- 2) PPC6700 devices – To download the free Sprint IP Wireless application, go to: www.sprintrelay.com/download/treo.

Sprint IP Wireless allows users to have the mobility to make a relay call when they need to without a TTY or computer and can be assured the connection is with an experienced Sprint Relay operator.

CapTelSM (Captioned Telephone) relay service is a leading-edge technology developed by Ultratec, Inc. of Madison, Wis., that allows people to receive both voice and text captioning, nearly simultaneously. A special, *CapTel*-equipped phone is required in order to place a call through the *CapTel* relay service. The *CapTel* phone works like any traditional phone with callers talking and listening to each other, but with one very significant difference – captions are provided live for every call. The captions are displayed on the *CapTel* phone's built-in screen

so the user can read the words while listening to the voice of the other party. For more information on *CapTel*, visit www.captionedtelephone.com.

Relay Conference CaptioningSM, developed by Caption Colorado, combines real-time captioning and standard relay service to provide relay conference captioning calls for deaf and hard-of-hearing individuals (in participating Sprint Relay state programs). By using an Internet Text Streaming platform supported by skilled captionists, RCC provides highly accurate real-time captioned text for any live conference call. For more information, please visit www.sprintrelay.com

Appendix N: Copy of TSP Press Release

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General Press Release

Sprint Completes Voluntary Telecommunications Services Priority Program Enrollment for Relay Network

OVERLAND PARK, Kan. – November xx, 2005 – Sprint (NYSE: S) today announces that it has completed the final milestone in enrolling Sprint's telecommunications relay service (TRS) in the FCC's Telecommunications Service Priority (TSP) Program. Sprint TRS, communications services available for individuals who are deaf, hard of hearing or have a speech disability, is comprised of a network of call centers geographically disbursed throughout the United States.

Effective October 31, 2005, all 14 Sprint Relay call centers were successfully activated under the TSP Program. Unlike other TRS providers, Sprint's TRS network is designed to reroute traffic to other Sprint Relay centers across the country to continue uninterrupted service with minimal customer impact.

"In less than five months, we were able to complete the implementation of the FCC's TSP program," said Mike Ligas, director of Sprint Relay. "Sprint is dedicated to providing effective communications services for individuals who are deaf or hard of hearing and we recognized the urgency to ensure reliable communications during emergency situations."

In 1988, TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or

national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

Sprint Relay Portfolio of Services

Sprint has 15 years of experience in providing relay services to persons who are deaf, hard of hearing or deaf-blind or who have a speech disability to communicate with hearing persons on the phone. Sprint offers relay services through an intelligent platform to the federal government, 30 states, the Commonwealth of Puerto Rico and New Zealand. Sprint's experience in the field provides the assurance that all Sprint Relay services will meet or exceed Federal Communications Commission requirements for telecommunications relay services (TRS). Relay service is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or call length. For more information, visit www.sprintrelay.com.

Sprint Government Systems Division (www.sprint.com/government) is based in Reston, Va., and offers the full range of Sprint product and service offerings for federal and state government customers.

About Sprint Nextel

Sprint Nextel offers a comprehensive range of wireless and wireline communications services to consumer, business and government customers. Sprint Nextel is widely recognized for developing, engineering and deploying innovative technologies, including two robust wireless networks offering industry leading mobile data services; instant national and international walkie-talkie capabilities; and an award-winning and global Tier 1 Internet backbone. For more information, visit www.sprint.com.

Appendix O: Consumer Complaint Log

Complaint Tracking for VT (6/1/2006 - 5/31/2007). Total Customer Contacts: 4

Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
03/05/07	VT CapTel user's call was unable to get through to the CapTel service.	03/05/07	Apologized for the incident and thanked the customer for sharing the problem. The VT CapTel user's call was unable to get through to the CapTel service. The incidence where a Sprint fiber optic cable cut between Madison and Chicago caused calls not to be able to reach the CapTel call center. CapTel traffic was re-routed to other networks to allow the VT CapTel's users calls to then get through the same day.
03/05/07	A different customer with same issue as above. VT CapTel user's call was unable to get through to the CapTel service.	03/05/07	Apologized for the incident and thanked the customer for sharing the problem. The VT CapTel user's call was unable to get through to the CapTel service. The incidence where a Sprint fiber optic cable cut between Madison and Chicago caused calls not to be able to reach the CapTel call center. CapTel traffic was re-routed to other networks to allow the VT CapTel's users calls to then get through the same day.
12/11/06	Voice user unable to connect to the CapTel service number.	12/11/06	Advised customer to have caller register long-distance carrier of choice. Also provided additional troubleshooting suggestions to ensure incoming call connection.
06/28/06	Customer stated that the agent took too long leaving message on the answering machine.	06/28/06	Supervisor on duty at the time noticed the message was more than a screen long, therefore, the agent had to make multiple calls in order to leave message in its entirety. Supervisor also noticed the agent did inform the customer of that and customer kept getting mad. Follow-up requested. Agent followed correct procedures, follow-up letter was sent to customer on 6/28/06 explaining this.

Appendix P: Sprint Outreach Scope of Work

[Note: Please see hard copy]

The Vermont Statutes Online

Title 30: Public Service

Chapter 5: POWERS AND DUTIES OF DEPARTMENT OF PUBLIC SERVICE

30 V.S.A. § 218a. Permanent telecommunications relay service

TITLE 30

Public Service

PART I

Department of Public Service

CHAPTER 5. POWERS AND DUTIES OF DEPARTMENT OF PUBLIC SERVICE AND PUBLIC SERVICE BOARD AS TO COMPANIES OTHER THAN RAILROADS AND AIRCRAFT

Subchapter I. General Powers

§ 218a. Permanent telecommunications relay service

(a) The department of public service shall develop the necessary standards for the establishment of a permanent, statewide telecommunications relay service and for an associated equipment program. The standards developed by the department shall be equal to or exceed those standards mandated by the Americans With Disabilities Act of 1990 (Public Law 101-336, 104 Stat. 327 (1990)) and expressly require that the designated provider of Vermont's telecommunications relay services comply, as expeditiously as possible, with any additional federal regulations which may be promulgated by the Federal Communications Commission in accordance with the provisions of this section.

(b) The department of public service shall issue a request for proposal seeking competitive bids from qualified vendors to provide telecommunications relay services and competitive bids from qualified vendors to provide telecommunications equipment in accordance with the provisions of this section, including the standards developed under subsection (a) of this section. The term of any contract shall not exceed four years.

(c) The department of public service may contract with the qualified bidder offering the most favorable proposal, giving due consideration to costs, to quality of service, and to the interests of the deaf, hearing impaired, and speech impaired community.

(d) The department of public service shall establish a Vermont telecommunications relay service advisory council composed of the following members: one representative of the department of public service, who shall act as chair and who shall be designated by the commissioner of public service; one representative of the department of disabilities, aging, and independent living, who shall act as vice-chair; two representatives of the deaf community; one member of the hard of hearing or speech impaired community; one representative of a company providing local exchange service within the state; and one representative of an organization currently providing telecommunications relay services. The members of the council who are not officers or employees of the state shall receive per diem compensation and expense reimbursement in amounts authorized by subsection 1010(b) of Title 32. The costs of such compensation and reimbursement, and any other necessary administrative costs shall be included within the contract entered into under subsection (c) of this section. The Vermont telecommunications relay service advisory council shall advise the department of public service and the contractor for telecommunications relay services on all matters concerning the implementation and administration of the state's telecommunications relay service.

(e) The department shall propose and the board shall establish by rule or order a telecommunications equipment grant program to assist deaf, deaf-blind, hearing impaired persons, speech impaired persons, and persons with physical disabilities that limit their ability to use standard telephone equipment to communicate by telephone. Pursuant to this program a deaf, deaf-blind, hearing impaired person, speech impaired person, or person with a physical disability that limits his or her ability to use standard telephone equipment whose modified adjusted gross income as defined in section 5829(b)(1) of Title 32 for the preceding taxable year was less than 200 percent of the official poverty line established by the federal Department of Health and Human Services for a family of six or the actual number in the family, whichever is greater, published as of October 1 of the preceding taxable year, may be eligible for a benefit towards the purchase, upgrade or repair of equipment used to access the relay service or otherwise communicate by telephone. The total benefits allocable under this section shall not exceed \$75,000.00 per year. In adopting rules the board shall consider the following:

- (1) prior benefits;
- (2) degree of functional need;
- (3) income;
- (4) number of applicants;
- (5) disposition of equipment upon change of residence; and
- (6) appropriate limits on per person benefit levels based on the equipment needed and the income level of the applicant.

(f) The costs of the state's telecommunications relay service and any equipment benefit under subsection (e) of this section shall be included as part of the Vermont universal service fund program. (Added 1991, No. 6, § 2, eff. March 20, 1991; amended 1997, No. 135 (Adj. Sess.), § 4; 1999, No. 67 (Adj. Sess.), § 2; 1999, No. 157 (Adj. Sess.), § 6; 2001, No. 93 (Adj. Sess.), § 1; 2005, No. 171 (Adj. Sess.), § 4; No. 174 (Adj. Sess.), § 59.)

Vermont Universal Service Fund Charge

The *Vermont Universal Service Fund (VUSF)* charge remains unchanged at 1.25% for most in-state and interstate telecommunications services beginning September 1, 2007. The VUSF was established by the Vermont Legislature to fund the Lifeline Telephone Discount Program, the Vermont Telecommunications Relay Service (VTRS), the Vermont Telecommunications Equipment Distribution Program and a statewide *Enhanced 911* emergency calling system.

Vermont Telecommunications Relay Service (VTRS)

The *VTRS*, established in compliance with the Federal Americans with Disabilities Act, provides telephone access to deaf, hard-of-hearing, and speech-disabled Vermonters. VTRS enables telephone communication between users of text telephones (as well as other adaptive telephone equipment) and regular phone users. Relay Service users are billed for their relay toll calls as if the calls had been direct-dialed. In-state toll charges on relay calls are discounted by 50%. VTRS calls are clearly identified on your bill. To place a relay call, dial *711*. There is no charge to reach the Relay Service.

The Vermont Telecommunications Equipment Distribution Program provides assistance to low-income, deaf, hard-of-hearing and speech-disabled Vermonters to acquire text telephones and other equipment. For information call **1 888 254-3323** (voice or TTY).

What is the Lifeline Telephone Credit?

The Lifeline program provides a credit of at least \$13.50 on the monthly telephone bills of income-eligible Vermont residents.

Who is eligible for the Lifeline Telephone Credit?

Two groups of Vermont residents with telephone service are eligible for the credit. You are eligible if you reside in Vermont, have phone service, and

- you will be 65 or older by June 15, 2007 and your household income is less than \$23,100;

OR

- you are under 65 and your household income is less than \$19,800

You need to submit an application for Lifeline credit each year.

What income must be included?

You must include your Adjusted Gross Income (Federal Form 1040, Line 37; or 1040A, Line 21; or 1040EZ, Line 4). This is before deduction of any loss from a trade or business, partnership, small business corporation, rental property or capital loss. This is added to all other taxable and non-taxable income such as alimony, support money, cash public assistance and relief, cost of living allowance, serviceman's dependent allowances, gross amount of pensions and annuities, railroad retirement benefits, Social Security payment, veteran's benefit act payments, nontaxable interest received from Federal or state instrumentality, unemployment and worker's compensation, gross amount of "lost time" insurance and total capital gains. It does not include gifts from nongovernmental sources, food stamps, relief in kind supplied by a government agency, or payments made by the State for foster care or care of a developmentally disabled person.

When and how do you apply?

All eligible telephone subscribers should mail the completed application on or before June 15, 2007 to:

**Vermont Department of Taxes
133 State Street
Montpelier, VT 05633-1401**

Applications submitted after June 15, 2007 will not be considered for the credit this year. However, this deadline may be waived by the Agency of Human Services if the application was delayed for good cause, such as sickness or disability.

The application may be submitted with your Vermont tax forms. If you are not required to file, you may send just this application to the Vermont Department of Taxes.

The Vermont Agency of Human Services processes your application. Your telephone company will receive notice of your eligibility and apply the credit to the telephone account of the name, telephone number and customer code you write on this application. It is very important the information on the application matches the information with your telephone company. **Before mailing your application, check your telephone bill for the spelling of your name, your telephone number, and the customer code that follows your telephone number.** If it is convenient, attach a copy of your telephone bill to this application.

Where do I find my Verizon Customer Code?

If you are a Verizon customer, your Customer Code is the three digits after your telephone number on your bill. Your phone number, plus these three digits, is your Verizon account number.

When will the Lifeline Credit begin?

If this is the first time you applied for the Lifeline credit, it may take up to three (3) months for the credit to appear on your telephone bill.

Do all telephone companies participate in Lifeline?

No. Only the following companies must offer Lifeline: Franklin Telephone; Fairpoint/Northland Telephone; Shoreham Telephone; TDS (Ludlow, Northfield, and Perkinsville); Topsham Telephone; Unisel; Verizon; Vermont Telephone; and Waitsfield/Champlain Valley Telecom. Other companies may offer a Lifeline discount but are not required to do so and do not get reimbursed for their Lifeline costs.

How can I get answers to my questions about Lifeline?

For more information about the application or the credit

- Seniors call the Senior HelpLine at 1-800-642-5119 to reach your local area agency on aging;
- Under 65 call the AHS Economic Services Division (formerly PATH) at 1-800-287-0589.

Persons who receive Reach Up, Food Stamps, Medicaid, or Fuel Assistance benefits may be eligible to apply year-round for Lifeline through the AHS Economic Services Division. To apply, contact your Economic Services Division district office.

A Change for Some Verizon Customers

Verizon now offers a Lifeline discount on its service packages in addition to its low use and standard measured service. If you were previously denied the Lifeline discount in connection with a Verizon package, you should reapply for Lifeline in 2007.

VERMONT TELECOMMUNICATIONS RELAY
SERVICE
OPERATING STANDARDS

Vermont Department of Public Service

Revised August 2007 Vermont Telecommunications Relay Service

OPERATING STANDARDS

Pursuant to VSA Title 30 Section 218a Permanent Telecommunications Relay Service, the Vermont Department of Public service (“DPS”) has established the following standards for the Vermont Telecommunications Relay Service (“VTRS”).

A. COMPLIANCE WITH FCC FINAL REGULATIONS

The Vermont Telecommunications Relay Service (VTRS) shall meet or exceed FCC regulations governing relay service.

B. SCOPE OF SERVICE

1. Hour of Service

VTRS shall provide a consistent level of service 24 hours per day, 7 days per week, 365 days per year.

2. Equipment

The transmission circuits shall meet or exceed FCC interexchange performance standards for circuit loss and noise. The telecommunications equipment shall be:

Capable of receiving and transmitting in both Baudot and ASCII codes, at any speed in general use, able to automatically identify all incoming TTY signals as either Baudot or ASCII, and compatible with industry-wide standards for TTY machines.

3. System Design

The system design shall be adaptable to improvements in communications equipment technology and capable of immediate expansion to meet any increased demand.

4. Network Access

The system shall provide for local, IntraLATA, interstate, and international calling.

5. Service Reliability

a. Uninterruptible Power

a The system shall provide uninterruptible power for minimum of 8 hours. The uninterruptible power system (UPS) shall support the switch system and its peripherals, switch room environmentals (air conditioning, fire suppression system, emergency lights and system alarms), operator consoles/terminals, operator work site emergency lights, and Call Detail Record (CDR) recording.

b Switching System

The system shall provide built-in redundancies to ensure that no calls are dropped due to processor failure.

c Intercept Messages

Intercept messages as appropriate for both voice and TTY messages shall be provided if a system failure occurs within the relay switch or on outbound circuits. Both voice and TTY messages shall be provided.

d Disaster Recovery Plan

The VTRS shall have a detailed plan for dealing with all types of natural or man-made disasters, including plans for notifying the DPS's Consumer Affairs Division immediately if a major problem occurs.

6. Staffing

The VTRS shall actively recruit and hire people with disabilities including individuals who are deaf, hard-of-hearing, speech disabled and deaf-blind. Emphasis shall also be given to recruiting and hiring individuals with American Sign Language (ASL) and relay service experience and with experience working within the deaf, hard-of-hearing, or speech disabled communities.

The relay center shall not utilize volunteer relay operators.

7. Staff Training in Disability Awareness

All relay center staff, including management, shall be trained in ASL "gloss" and grammar, Deaf culture, speech disability issues, and ethics and confidentiality.

8. Speech-to-Speech, Interstate Spanish Relay, Voice and Hearing Carryover, CapTel

Speech-to-Speech and interstate Spanish Relay shall be provided by March 1, 2001. The relay center shall have both voice and hearing carryover capability, as well as provide CapTel service.

9. In-state Toll-free Numbers

The system shall be able to call in-state and regionally restricted toll-free numbers, and the business offices of local telephone companies that have special prefixes identifying the call as toll-free.

10. Intrastate Toll Calls

Rates for intrastate service shall be discounted 50 percent for all users of the relay system.

11. Interstate and International Calls

Access to FCC certified, federally funded, interstate and international relay service will be provided.

12. Access to Interexchange Carriers

The system shall allow relay users to choose their preferred interexchange carrier when placing toll calls through relay.

13. Billing Arrangements

The system shall provide billing for collect calls, person-to-person calls, calls to or from hotel rooms, calls using account codes, calls charged to a third party, pay per call services (i.e., 900#'s) and any inter-exchange company calling card calls. Users shall receive a detailed description of tolls on their bills.

14. Charges for Services

Calls using the relay service shall be at no cost to the person making the call, except for applicable intrastate or interstate tolls and discounts. The system shall provide toll-free numbers or equivalent network access for users.

15. Voice Mail and Interactive Menus

CA's must alert the TRS user to the presence of a recorded message and interactive menus through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls which must be made by the relay user in order to complete calls involving recorded or interactive messages.

16. Call Billing Record

The system shall identify and document long distance and toll calls for billing purposes. Documentation shall contain, at a minimum. The following information:

- a. Telephone number or credit card number to be billed (NPA-prefix-line number);
- b. Originating telephone number (NPA-prefix-line number);
- c. Terminating telephone number (NPA-prefix-line number);

- d Date;
- e Start time (the time the calling party is initially connected to the called party or to an answering machine at the called party's number or to a recorded message or intercept for the called number);
- f End time (the time when either the called party or the calling party hangs up);
- g Call time to the full second (the time in between start time and end time).

The system shall be automated as completely as possible.

17. Access to Local Exchange Company Enhanced Services

The system shall be able to allow users to use local exchange convenience services: call forwarding, three-way calling, Caller ID and last-number redial.

18. Access to 9xx and 8xx Pay-Per-Call Services

The system shall allow for access to 9xx and 8xx number services that charge for usage. The 50 percent discount rate for interstate relay calls does not apply to pay-per-calls.

19. Customer Preference Database

The system shall be able to store and modify users' call preferences such as type of call, billing information, speed dialing, slow typing, carrier of choice, etc., such that this information appears on the CA's screen when the user calls the relay center from the registered ANI (automatic number identification).

C. SYSTEM STANDARDS

1. Usage

No restrictions shall be placed on the length or number of calls placed by customers through the relay center.

2. Blockage Rate

No more than 1% of calls at the busiest hour will be unable to be delivered to the relay center network due to inadequate facilities. In addition, there is a minimum blockage standard, measured daily, of no greater than 1%. This call blockage rate shall be measured by dividing the number of blocked and not answered calls by the number of total call attempts.

3. Average Answer Time

At least 85 percent of the calls shall be answered by a Communications Assistant (CA) within ten seconds. This shall be measured on a daily basis. No more than 30 seconds shall elapse between receipt of dialing information and the dialing of the requested number.

4. Operator Assistance

TTY users requiring operator assistance shall be given the toll-free number for Operator Services for the Deaf. The Communications Assistant will call Directory Assistance if requested to do so by the caller.

5. Complaint Resolution

The VTRS shall have procedures for handling complaints, inquiries and comments regarding VTRS services and personnel. Procedures shall include mandatory provision of the DPS's Consumer Affairs TTY Hotline/consumer complaints number when consumers indicate, directly or indirectly, that they are not satisfied with VTRS response. The procedure and the Hotline number shall be described in appropriate printed outreach material.

Any caller to the relay center having a complaint shall be able to reach a supervisor or administrator while still on line.

All complaints received by VTRS shall be forwarded to the DPS monthly. The VTRS provider will keep a log that includes at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution. The Department will file the summary of the log annually with the FCC and at the time of recertification.

6. Conflict of Interest

The VTRS shall be an independent relay service. No information obtained from relay calls or other related services shall be made available or for sale.

7. Community Outreach

The VTRS shall provide an on-going community and business outreach program to educate all potential users in the state about the relay service.

8. Consumer Input

Users or the system shall be included in evaluation of the VTRS.

9. VTRS Advisory Council

The VTRS shall be advised on all matters concerning implementation and administration by an Advisory council, constituted as mandated in VSA Title 30 Section 218a Permanent Telecommunications Relay Service. Section 218a constitutes the Advisory Council as follows: One representative of the Department of Public Service, who will act as chair; one representative of the Department of Disabilities, Aging and Independent Living, who will act as vice chair; two members of the deaf community; one member of the hard of hearing or speech disabled community; one representative of a company providing local exchange service within the state and one representative of an organization currently providing telecommunications relay service. Terms for advisory members shall be as follows: the representatives of particular entities shall be appointed every two years; individuals serving as community sector representatives terms shall serve no more than three consecutive two-year terms. Community sector representatives wishing to leave after their second two-year term shall give the advisory council three months' advance notice.

D. CA STANDARDS

1. Minimum CA Qualifications

VTRS CAs shall meet certain minimum standards, including:

- a. Basic skills in English grammar.
- b. Minimum typing speed of 60 words per minute.
- c. Minimum spelling skills equivalent to quickly and easily spelling words comparable to a beginning college level conversation.
- d. Diction, clarity, and formality of speech at a level appropriate to communication between business professionals.
- e. Ability to understand Deaf people using limited English and to translate limited written English to correct written English.
- f. Basic understanding of: the characteristics of ASL as it may be reflected in the written language of TTY users; Deaf culture; ethics and confidentiality.

2. CA Training

The VTRS shall provide ongoing training for CAs, including ASL “gloss” and grammar, Deaf culture and etiquette, needs of speech disabled users, operation of relay

telecommunications equipment, procedures, ethics and confidentiality, and professional judgment.

Trainees shall be identified to both parties at the outset of each conversation.

3. Procedures for Relaying Communication

CAs shall convey the full content, context and intent of the communication they translate. Unless requested otherwise by a user, The CA shall relay all calls according to the following procedures.

- a. CAs shall identify themselves to a TTY user by number and gender at the beginning of each call and by number to a voice caller. Requests by users for a CA of a particular gender will be honored.
- b. Unless otherwise directed by the user, CAs shall translate into standard English calls of users who have limited written English language skills so that hearing persons can understand the call and communication occurs. The hearing person's English must be translated back into written English at a level that the deaf person can understand. TTY users may instruct the CA to voice in standard English or word for word that which the TTY user types.
- c. CAs shall, to the best of their abilities, let the TTY user know the non-TTY user's tone of voice. They shall, whenever possible, type in parentheses that a person is being rude, is yelling, is being humorous, is laughing, is impatient, or other characterizations of behavior. Such descriptions and other similar utterances shall be preceded by the word "sounds." CAs shall also type any background noise that the CA hears.
- d. CAs shall also keep the user informed on the status of the call, such as dialing, ringing, busy, disconnected or on hold.
- e. The TTY user shall have the option of telling the CA what aspects of the call that he/she will handle. For example, the TTY user may request to introduce relay services to the called party, rather than have the CA do it.
- f. The CA shall type to the TTY user or verbalize to the non-TTY user all that is said when the call is first answered and at all times during the conversation, unless either party specifically requests otherwise.
- g. When the CA needs to explain relay to a hearing user, the CA shall also type "(explaining relay)" for the benefit of the TTY user. Conversely, when the CA needs to explain

relay to a TTY user, the CA will inform the hearing user that the CA is explaining relay. Upon request by the user, the CA shall not announce a call as a relay call, permitting the caller to provide explanation, if any. The CA shall not indicate that the TTY user is Deaf, hard-of-hearing, or speech disabled unless the TTY user requests that information to be relayed.

- h. When speaking for the TTY user, the CA shall adopt a conversational tone of voice appropriate to the type of call being made.
- i. CAs shall indicate to the TTY user if another person (hearing) comes on the line
- j. CAs will stay with a relay call for a minimum of ten minutes with the exception that if a CA is relaying a Speech-to-Speech call they will be required to stay with the call for a minimum of fifteen minutes.
- k. When a line is busy, a CA shall redial as many times as requested.
- l. All comments directed to either party by the CA shall be relayed. These comments shall be typed in parentheses, for example, “(Will you accept a collect call?).” All comments directed to the CA by either party shall also be relayed, for example, “Yes. I’ll accept the collect call.”
- m. If either party uses the third person, the CA shall relay in the third person.
- n. To correct a typing error, CAs shall not backspace, but continue in a forward direction by typing “xx” (common TTY convention for error) and then typing the word correctly.
- o. CAs shall verify spelling of proper nouns, numbers and addresses that are spoken. This shall be relayed as discussed in “l” above.
- p. The CA will stay on the line until both parties have terminated the call. The CA will ask the user if additional calls are desired. If necessary to process a complaint or compliment, the call will be transferred to a supervisor.
- q. CAs shall not counsel, advise, hold conversations with or interject personal opinions or additional information into any relay call. CAs shall not hold personal conversations with anyone calling VTRS even if prompted by a VTRS user.
- r. Callers shall not be required to give their full names or the full name of the party they are calling. This information shall not be recorded in any form without the

permission and knowledge of the caller (except for long distance billing purposes). It is understood that for some calls, having the full name would help facilitate the call. The CA may ask for that information and explain how it may facilitate their call. However, the CA shall not refuse to make a call if the caller does not wish to give full names.

- s. CAs will uniformly recognize an “s” typed by a TTY user at the beginning of a call to indicate that the user is speech impaired. This convention shall be included in all informational material produced and distributed to explain relay usage.
- t. CAs will leave or retrieve messages on answering machines or other voice processing systems.
 - i. The CA will inform the caller when an answering machine has been reached.
 - ii. The CA will ask the caller if s/he wishes to leave a message.
 - iii. The CA will leave the caller’s message, either by voice or by TTY.
 - iv. The CA will confirm to the caller that the message has been left.
 - v. The caller will be charged only for one call regardless of the number of redials required to retrieve or leave a message.
 - vi. The caller’s directions to the CA of how s/he wants the call handled will override established procedures.

4. Confidentiality of Calls

All calls shall be totally confidential, which means no written or electronic script shall be kept beyond the duration of the call, with the exception that a CA shall record recorded messages. This will allow the CA to replay the message at the relay center and rewind it as needed to relay the complete text of the message. CAs and supervisory personnel shall not reveal information about any call, except the minimum necessary for billing purposes. CAs shall be required to sign a pledge of confidentiality promising not to disclose the identity of any callers or any information learned during the course of relaying calls, either during the period of employment as a CA or after termination of employment.

CAs shall not reveal the identity of fellow CAs unnecessarily, since CAs identified by name, and thus potentially known in the Deaf, hard-of-hearing, and speech

disabled communities, defeats the concept of “transparency” of the relay service and may create discomfort on the part of users.

- a. When training new CAs by the method of sharing past experience, trainers shall not reveal any of the following information:
 - i. Names, genders, or ages of the parties of the call;
 - ii. Originating or terminating points of the call;
 - iii. Specifics of the information conveyed.
- b. CAs shall not discuss, even among themselves or their supervisors, any names or specifics of any relay call, except in instances of resolving complaints. CAs may discuss the general situation that they need assistance with in order to clarify how to process a particular type of relay call. CAs must be trained to ask questions about procedures without revealing names or specific information that will identify the caller. If a user is in an emergency or life-threatening situation or causes an emergency situation to exist by threatening the CA or relay center, names and specific information may be disclosed by the CA to a supervisor to expeditiously address the situation.
- c. Watching or listening to actual calls by anyone other than the CA is prohibited except for training or monitoring purposes specifically authorized by the Department of Public Service.
- d. A CA or supervisor who, after investigation, is found to have violated the confidentiality rules and regulations shall either be terminated immediately or be given a warning and automatically terminated the second time it occurs.
- e. The VTRS shall collect only that personal information necessary to provide and bill for the relay service being rendered. This information shall not be used for any other purposes.
- f. CAs do not have to tolerate obscenity directed at them. Such calls may be transferred to a supervisor to determine why the caller is using obscenity and to explain that this is inappropriate.

5. CA Counseling

The VTRS shall provide a counseling and support program for CAs that will help them deal with the emotional aspects of relaying calls.

6. Emergencies

The VTRS shall have policies and procedures for handling and referring emergency calls, including procedures for referring callers to emergency services and numbers.

7. Policy and Procedures Manual

The VTRS provider shall maintain and revise as necessary a CA Policy and Procedures Manual that shall include as a minimum confidentiality, handling of emergency and crisis calls, consumer complaint and compliment procedures, consequences of non-compliance to policies, and functions and roles of a CA.

E. SERVICE PROVIDER REPORTING REQUIREMENTS

The VTRS provider shall submit to the DPS by the 21st calendar day of the following month statistics, consistent with FCC requirements and as specified in the contract between the VTRS provider and the DPS, on the use of the VTRS for the previous month.

F. TRANSITION TO A NEW PROVIDER

At such time as the relay service may be transferred to a new provider, the outgoing provider shall make every effort to ensure that the transfer takes place in a manner that prevents relay users from experiencing an interruption in service. The relay service and consumer service toll-free numbers or other telephone numbers shall be made available to the new provider, with the new provider paying any costs associated with the transfer.

Appendix T: 2006-2008 VTRS Request for Proposals

[Note: Please see hard copy]

Appendix U: Sprint Contract to Provide the Vermont Telecommunications Relay Service

[Note: Please see hard copy]

Appendix V: Letter to the FCC Notifying of Substantive Change



State of Vermont
Department of Public Service
112 State Street
Drawer 20
Montpelier, VT 05620-2601
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September 15, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, DC 20554

RE: Notice of substantive change in Vermont
Telecommunications Relay Service

Dear Madame Secretary:

As required by 47 C.F.R. §§ 64.605 (f), Vermont is hereby notifying the Federal Communications Commission of a substantive change in the Vermont Telecommunications Relay Service.

As of July 1, 2004, Vermont added Captioned Telephone (CapTel) service to the relay services available to Vermont consumers. CapTel service was added pursuant to the attached letter of agreement dated June 10, 2004, between the Vermont Department of Public Service (VT DPS) and Sprint. Vermont's relay provider under Vermont Contract #3658. The VT DPS requested clarification from the Vermont Public Service Board (Board), per the attached letter dated April 14, 2004, as to whether Board approval would be required to add this service in light of the fact that the addition of CapTel would not increase the existing contract price. When the Board did not respond, the DPS interpreted this silence as meaning that no Board approval was required.

I apologize for the delay in providing notification to the Commission of this substantive change in Vermont's TRS, as required under § 604.605 (f).

No other substantive changes to the state's TRS program have occurred since Vermont notified the Commission on August 19, 2002, that Vermont changed its relay provider from AT&T to Sprint. The contract with Sprint includes stringent provisions that ensure the program meets or exceeds federal minimum standards for TRS. In addition, the VT DPS manages the contract and monitors the service to ensure compliance with FCC standards and state requirements. We can therefore certify that Vermont continues to meet federal minimum standards following this substantive change.



If there are any questions about this change, please direct them to me. I may be reached at 802-828-4015 or susan.paruch@state.vt.us. Thank you.

Sincerely,

Susan L. Paruch, on behalf of
Stephen J. Wark, Director
Consumer Affairs & Public Information

Encs.